

Dear Clerk of Court,

My name is Robert L. Adams JR and I am currently incarcerated at Bucks county Correctional Facility in Doylestown Pennsylvania. My Inmate number is: 074562. Inside / enclosed you'll find The Following:

\*A TABLE OF Exhibits\*

1. A Pro-se Civil Rights complaint By Plaintiff Robert L Adams JR against Bucks county correctional and 63 defendants employed by the prison.
2. A motion For the production of documents
3. An Attached complaint part Two
4. A motion For Immediate Help and Relief
5. A memorandum OF Law
6. An IN FORMA PAUPERIS FORM

Please Be Advise That There is a complaint out there with evidence and exhibits That I gave To public Defender "Michael Huff" of Norristown Pennsylvania, To mail For me on 4/21/23. The complaint WAS inside of a manilla envelope and That manilla envelope was inside of a sealed manilla envelope with Five U.S postage stamps on it. Attorney michael



HUFF stated He would add whatever additional Postage was needed To mail the envelope To The Federal Courthouse in Philadelphia Pennsylvania at 601 Market Street, Room 2609. That Complaint contains other evidence that this Complaint doesn't have Because it with The First Complaint. The First Complaint is also articulated a little differently and it has more details. Therefore I Humbly and Respectfully Request that this Honorable Court Adds That Complaint To this one when its Received. More Has indeed Happened To me since the Filing (4/21/23) of the First Complaint and it has Been injected to This Complaint Before you.

Thank you so very much For your Time, Help and Consideration.

Respectfully Submitted  
Robert L Adams JR  
Robert L Adams JR  
5/28/23

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Robert T. L. Adams JR

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Bucks county Correctional Facility  
(see Attached)

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

## COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Prisoner Complaint)

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

The Clerk will not file a civil complaint unless the person seeking relief pays the entire filing fee (currently \$350) and an administrative fee (currently \$52) in advance, or the person applies for and is granted in forma pauperis status pursuant to 28 U.S.C. § 1915. A prisoner who seeks to proceed in forma pauperis must submit to the Clerk (1) a completed affidavit of poverty and (2) a copy of the trust fund account statement for the prisoner for the six month period immediately preceding the filing of the complaint, obtained from and certified as correct by the appropriate official of each prison at which the prisoner is or was confined for the preceding six months. See 28 U.S.C. § 1915(a)(2).

If the Judge enters an order granting a prisoner's application to proceed in forma pauperis, then the order will assess the filing fee (currently \$350) against the prisoner and collect the fee by directing the agency having custody of the prisoner to deduct an initial partial filing fee equal to 20% of the greater of the average monthly deposits to the prison account or the average monthly balance in the prison account for the six-month period immediately preceding the filing of the complaint, as well as monthly installment payments equal to 20% of the preceding month's income credited to the account for each month that the balance of the account exceeds \$10.00, until the entire filing fee has been paid. See 28 U.S.C. § 1915(b). **A prisoner who is granted leave to proceed in forma pauperis is obligated to pay the entire filing fee regardless of the outcome of the proceeding, and is not entitled to the return of any payments made toward the fee.**

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Robert L. Adams Jr

All other names by which  
you have been known:

074562

ID Number

Bucks county Correctional Facility

Current Institution

1

Address

1730 S. Easton RoadDoylestownPA18901

City

State

Zip Code

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name

Superintendent MetellusJob or Title (*if known*)Superintendent of Bucks count Correctional Facility.

Shield Number

Employer

Bucks county prison

Address

1730 S. Easton RoadDoylestownPA18901

City

State

Zip Code



Individual capacity



Official capacity

**Defendant No. 2**

Name

Kelly ReedJob or Title (*if known*)Deputy warden

Shield Number

Employer

Bucks county Correctional Facility

Address

1730 S. Easton RoadDoylestownPA18901

City

State

Zip Code



Individual capacity



Official capacity



## Defendant No. 3

Name

Deputy warden Baltimore

Job or Title (if known)

Deputy warden

Shield Number

Employer

Bucks County Correction Facility

Address

1730 S. Easton Road

Doylestown

PA

18901

City

State

Zip Code



Individual capacity



Official capacity

## Defendant No. 4

Name

L.T. Wyllie

Job or Title (if known)

Lieutenant

Shield Number

Employer

Bucks County Correction Facility

Address

1730 S. Easton Rd

Doylestown

PA

18901

City

State

Zip Code



Individual capacity



Official capacity

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

Federal officials (a *Bivens* claim)

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Being Beaten, excessive force, cruel and unusual punishment, denying me access to the court, due process violations, mental torture, intentional infliction of emotional distress, defamation of character, negligence, deliberate indifference, attempted murder, assault, 14<sup>th</sup> Amendment of Equal Protection violations, calculated harassment, retaliation, 1<sup>st</sup> Amendment violations, inhumane conditions, medical malpractice, false imprisonment, 4<sup>th</sup> Amendment, 8<sup>th</sup> Amendment, physical abuse

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

(see Attached Handwritten Complaint)

### III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (check all that apply):

- ☒ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☒ Other (explain)

I am a parole violator whose being held in Bucks county awaiting trial for criminal charges. State parole board of PA sanctioned me to 9 month hit as recommit to the state but I'm behind in Bucks on charges

### IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

on Bravo-Block, on RHU (Restricted Housing unit) and on THE MHU (mental health unit)



C. What date and approximate time did the events giving rise to your claim(s) occur?

11/1/22 at 8:30AM and continued through to this very day's date of 5/27/23

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

Facility Failed to protect me with its UNSECURE security doors  
Does belong to them. Guards calling/labeling plaintiff a switch, Guard getting plaintiff assaulted by another inmate, Guard psychologically torturing inmate/plaintiff for three weeks non-stop 11-2-22 to 11-21-22. Staff beating cuffed subdued plaintiff fracturing his nose, torn ligaments in hand and shoulder from excessive force. Facial contusion and head swelling. Being forced to sleep on cold bed frame without mattress for weeks, being denied shower for weeks, for spit in for weeks, being strapped naked and left naked in front of other inmates twice, denied medical treatment, nurse attempting to deliberately murder plaintiff by poisoning him with different meds, cross gender strip search, excessively searching to harass, false imprisonment, removing legal documents illegally, opening and reading plaintiff's legal mail, denying visits, denied access to petition the courts, threatened, punched in face, kicked in face, called niggers, switchers, faggots, homo muslim, homo muhammad, denied equal protection under 14th amendment, discriminated against racially, humiliate for staff amusement.

#### V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Fracture nose, torn ligaments in right hand, torn ligaments in right shoulder, infection, left temple contusion, head swelling, leg-ankle-feet swelling, severe depression, fear due to staff threatening to kill me and fear due to two staff members attempting to murder me, sleep deprivation, anxiety, PTSD

#### VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Plaintiff respectfully request \$100,000 (100 hundred thousand) from each defendant for all the reason set forth in plaintiff's attached handwritten complaint and \$60,000 (sixty thousand) from each defendant for punitive and nominal damages for all the suffering and deliberate humiliation, hurt, pain and everything else within the attached handwritten complaint

**VII. Exhaustion of Administrative Remedies Administrative Procedures**

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

*Bucks county correctional Facility*

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☒ Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☒ Yes

☐ No

☒ Do not know

If yes, which claim(s)?

*not really sure what this question means, I wrote about the violations and more.*



- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☒ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☒ Yes

☐ No

- E. If you did file a grievance:

1. Where did you file the grievance?

George W. Hill Correctional Facility in Delaware County

2. What did you claim in your grievance?

Beating, Assault, False imprisonment, Excessive Force, Being Stripped naked and left naked in front of other inmates, Being Stripped searched in front of a woman, belated a switch, Fractured nose, TEEN VIGILANTE, cruel and unusual punishment, excessive searching, Harassment, Reading my legal mail, Taking my legal mail that didn't have books name on it, not being protected by officers, not being protected by cell security, Doork, CB psychologically tormenting me and threatening to kill me and more, medical staff stripping me, Offhand medication, discrimination, being perred law library, unjustly given more hole time, being denied mattress, shower, yard, Client and Attorney confidentially chilled, visits (see attached complaint).

3. What was the result, if any?

no Help <sup>denied</sup>, no investigation, Deliberated Denied Equal Protection.

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

I wrote Request slips and appealed to The Highest Level.

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

*I Filed grievances all way up.*

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

*LT Thompson, and Told Sgt. N. Cruz, Beck, Raggi, Kekulin, wrote the Prison Society, NAACP, Pennsylvania institution law protect*

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

*Appealed To The Prison oversight Board, The highest level.*

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

#### VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes

☒ No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.



- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court *(if federal court, name the district; if state court, name the county and State)*

3. Docket or index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition. \_\_\_\_\_

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☒ Yes☐ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s)

ROBERT L. ADAMS JR

Defendant(s)

Delaware COUNTY et al.,

2. Court (if federal court, name the district; if state court, name the county and State)

IN THE EASTERN DISTRICT OF PENNSYLVANIA

3. Docket or index number

2:23-CV-01178-JFM

4. Name of Judge assigned to your case

HONORABLE JOHN F MURPHY

5. Approximate date of filing lawsuit

3/24/23

6. Is the case still pending?

☒ Yes☐ No

If no, give the approximate date of disposition

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)



**IX. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 5/27/23

Signature of Plaintiff

Printed Name of Plaintiff

Prison Identification #

Prison Address

Robert L. Adams Jr  
Robert L. Adams Jr  
074562  
1730 S. EASTON ROAD  
DOYLESTOWN PA 18901  
City State Zip Code

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
City State Zip Code

Telephone Number

E-mail Address

\_\_\_\_\_  
\_\_\_\_\_

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

Robert L. Adams JR  
Plaintiff

v.

CASE NO.

Bucks county Correctional Facility;  
SUPERINTENDANT METELLUS;  
deputy warden KELLY REED; Deputy  
warden ~~M~~ Galione; Deputy warden  
Cantino; LT. K. Wylie; LT. Kavoch;  
LT. M. Clayton; LT. C. Hugg;  
LT. J. Whitesall; Sgt. N. Murphy;  
Sgt. M. Raggs; Sgt. A. Beck;  
Sgt. B. CROUS; Sgt. N. CRUZ;  
Sgt. C. Odonnell; Sgt. A. CRUZ;  
Sgt. K. Kinkelin; C/O F. Williams;  
C/O Schuster; C/O McFadden;  
C/O Swan; C/O B. Butler; C/O New;  
C/O Clarke; C/O HARRISON; C/O M. Gray;  
C/O D. Connor; C/O John Doe #1;  
C/O John Doe #2; C/O John Doe  
#3; C/O John Doe #4; C/O Black;  
C/O Geibert; C/O Romans; C/O Mayers;  
C/O Miles; C/O Faggins; C/O Smythe;  
C/O HortiJenko; C/O Glenn;  
C/O Bromick; Captain Nottingham;  
C/O Black, C/O

①



c/o Barrette, c/o J. Polichetti  
 Bucks county policy makers;  
 buck county medical department;  
 PrimeCare medical, Inc.;  
 chief medical Administrator Brian;  
 van Fleet; Doctor Gessner;  
 nurse Jamie; nurse ENNA;  
 Sgt. Jurgelewicz; Sgt. Hodges;  
 c/o south; c/o Keefe; c/o Mattoij;  
 c/o Kasprzik; c/o Boque;  
 c/o LaBadie; Bucks county  
 misconduct Examiner Dittman;  
 case manager David Webb;  
 Bucks county correctional Administration;  
 Defendants

## JURISDICTION & VENUE

1. This is a civil action authorized by 42 U.S.C. section 1983 to Redress the deprivation, under color of state law, of Rights secured by the Constitution of the **UNITED STATES**. The court has Jurisdiction under 28 U.S.C. section 1331 and 1343(a)(3). plaintiff seeks declaratory Relief pursuant to 28 U.S.C. section 2201 and 2202. plaintiffs claims for injunctive Relief are authorized by 28 U.S.C. section 2283 & 2284 and Rule 65 of the Federal Rules of civil procedure.

2. venue lies in this Judicial district pursuant to 28 U.S.C. § 1391 (b)(2) because the events giving rise to this  
 (2)



Action occurred in Bucks county, Pennsylvania, within the eastern District of Pennsylvania.

## PARTIES

3. Plaintiff Robert L. Adams JR is a 42-year-old man who is incarcerated at Bucks county correctional Facility in Doylestown, Pennsylvania since October 1, 2022 to this current day, awaiting Trial.

4. Defendant Bucks county is a municipal corporation organized under the Laws of the Commonwealth of Pennsylvania. Bucks county receives Federal Financial assistance for the operation of Bucks county correctional Facility.

5. Defendant C. Metellus is the Superintendent of Bucks county correctional Facility. He is legally responsible for the operation of Bucks county correctional Facility and for the welfare of all the inmates in that prison.

6. Defendant Kelly REED is the Deputy warden of Bucks county correctional Facility. She is legally responsible for the operation of Bucks county correctional Facilities Inmate affairs and for the welfare of all the inmates in that prison.

7. Deputy warden Galione is/was the Deputy warden at Bucks county correctional Facility. He was legally responsible for



operations of Bucks correctional Facility and the welfare of all the inmates in that prison.

8. Defendant Deputy warden Cantino is the deputy warden at Bucks county correctional Facility. He is legally responsible for the operations of Bucks county correctional Facility and the welfare of all the inmates in that prison.

9. Defendant Captain Nottingham is the captain at Bucks county correctional Facility. He is legally responsible for operations of Bucks county correctional and the welfare of all the inmates in that prison.

10. Defendant K. Wylie is a Lieutenant officer at Bucks county correctional Facility, who, at all times mentioned in this complaint, held the rank of Lieutenant and was assigned to Bucks county correctional Facility.

11. Defendant Lieutenant M. Clayton is a lieutenant ~~and~~ officer at Bucks county correctional Facility, who, at all times mentioned in this complaint, held the rank of lieutenant and was assigned to Bucks county correctional Facility.

12. Defendant Lieutenant C. Hugg is a lieutenant at Bucks county correctional Facility, who, at all times mentioned in this complaint, held the rank of lieutenant and was assigned to Bucks county correctional Facility.

(4)



13. DEFendant Lieutenant J. Whitesall is a lieutenant officer at Bucks county correctional Facility, who, at all times mentioned in this complaint held the rank of ~~LIEUTENANT~~ and was assigned to Bucks county correctional Facility.

14. Defendant Kavoch is a lieutenant officer at Bucks county correctional Facility, who at all times mentioned in this complaint held the rank of lieutenant and was assigned to Bucks county correctional Facility.

15. Defendant Sgt. N. Murphy is a sergeant officer at Bucks county correctional Facility, who held rank of sergeant at all times mentioned in complaint and was assigned to Bucks county correctional Facility.

16. Defendant Sgt. M. Paggi is a sergeant officer at Bucks county correctional Facility, who held rank of sergeant at all times mentioned in complaint and was assigned to Bucks county correctional Facility.

17. Defendant Sgt. A. Beck is a sergeant officer at Bucks county correctional Facility, who held rank of sergeant at all times mentioned in complaint and was assigned to Bucks county correctional Facility.

18. Defendant Sgt. R. Gross is a sergeant officer at Bucks county correctional Facility, who held rank of sergeant at all times mentioned in complaint and



was assigned to Bucks county correctional Facility.

19. Defendant Sgt N. Cruz is a Sergeant officer at Bucks county correctional Facility. who held Rank of Sergeant at all Times mentioned in complaint and was assigned to Bucks county correctional Facility.


20. Defendant Sgt C. O'Donnell is a Sergeant officer at Bucks county correctional Facility. who held Rank of Sergeant at all Times mentioned in complaint and was assigned to Bucks county correctional Facility.

21. Defendant Sgt. A. Cruz is a sergeant officer at Bucks county correctional Facility. who held Rank of Sergeant at all Times mentioned in complaint and was assigned to Bucks county correctional Facility.

22. Defendant Sgt K. Kinkelin is a sergeant officer at Bucks county correctional Facility. who held Rank of sergeant at all Times mentioned in complaint and was assigned to Bucks county correctional Facility.

23. Defendant Sgt. Jurgelewicz is a sergeant officer at Bucks county correctional Facility, who held Rank of sergeant at all Times mentioned in complaint and was assigned to Bucks county correctional Facility.



24. **DEFENDANT** Sgt Hodges is a sergeant officer at Bucks county correctional Facility. who held Rank of Sergeant at all times mention in this Complaint and was assigned to Bucks county Correctional Facility
25. Defendant correctional officer F. Williams
26. Defendant correctional officer Schuster
27. Defendant correctional officer McFadden
28. Defendant correctional officer Swan
29. Defendant correctional officer B Butler
30. Defendant correctional officer New
31. Defendant correctional officer Clarke
32. Defendant correctional officer Harrison
33. Defendant correctional officer M. Gray
34. Defendant correctional officer D. Connor
35. Defendant correctional officer John Doe #1
36. Defendant correctional officer John Doe #2 = 
37. Defendant correctional officer John Doe #3 = c/o Keefe
38. Defendant correctional officer John Doe #4 = LT. Minasian



39. Defendant correctional officer Black
40. Defendant correctional officer - Geibert
41. Defendant correctional officer Romano
42. Defendant correctional officer Mayers
43. Defendant correctional officer Moles
44. Defendant correctional officer Faggins
45. Defendant correctional officer Smythe
46. Defendant correctional officer Hortislenko
47. Defendant correctional officer Glenn
48. Defendant correctional officer Bromiley
49. Defendant correctional officer Barnette
50. Defendant correctional officer South
51. Defendant correctional officer Keefe
52. Defendant correctional officer Mattor
- 52.5. Defendant correctional officer Black
53. Defendant correctional officer Kasprzk
54. Defendant correctional officer Rogue
55. Defendant correctional officer J. Polichetti
56. Defendant correctional officer LaBadie
57. All named correctional officer Defendants are guards at Bucks County Correctional Facility and held the rank of Guard at all times mentioned in this complaint and was



Assigned to Bucks county correctional Facility.

57.5 Defendant Dittman is the misconduct hearing Examiner at Bucks county correctional Facility, who held the Rank of CEB misconduct Examiner all times mentioned in complaint who's Responsible For sentencing prisoners to BHU Time.

58. Defendant Brian Norfleet is the chief medical Administrator who works for primecare medical and Bucks county correctional Facility and he's Responsible For the inmates care, Including plaintiff Mr. Adams wellbeing while incarcerated at Bucks county.

59. Defendant David Webb is the case manager and was the case manager for Bucks county correctional Facility. He is Responsible For the inmates assigned to Him and plaintiff Adams was on His list/case load.

60. Defendant nurse Jamre is a nurse at Bucks county correctional Facility who was Hired By primeCare medical Inc and Bucks county. He's Responsible For All the Inmates health care, Including plaintiff Adams.

61. Defendant ENNA is a nurse at Bucks county correctional Facility who was Hired by primeCare medical Inc and Bucks county. She's Responsible For the care of All prisoners, Including plaintiff Adams.

62. Defendant Doctor Gessner is a Doctor who was Hired By primeCare Medical Inc, and Bucks county and was



assigned / Responsible For the medical care of all inmates medical care, including MR Adams while at Bucks corrections.

63. Defendant PrimeCare medical, Inc., is the medical provider for Bucks county correctional facility and are responsible for all the medical care for all inmates, including plaintiff Adams while being while incarcerated at Bucks county.

64. Defendant Bucks county policy makers **IS** Responsible for making the policies that operate Bucks county correctional facilities, instruct the guards and give rules and regulations to both guards and inmates at Bucks county.

65. Defendant Bucks county correctional facility Administration is the Administration at Bucks county who are legally responsible for the operations of Bucks county prison, the treatment of inmates and the rules and regulations.

66. Each defendant is sued individually and in his and her official capacity. At all times mentioned in this complaint, each defendant acted under the color of STATE LAW.



## Complaint

Plaintiff Robert L Adams JR is a 42-year-old man who was incarcerated at Bucks county correctional Facility in Doylestown Pennsylvania; on 10/1/22 for simple assault and other Related charges ~~out~~ of Bensalem Pennsylvania. while at Bucks county correctional Facility, Mr Adams was moved around a lot due to his Loud voice as staff didn't know how to take him or didn't feel like dealing with a confident openly gay manly man. He was eventually moved back to B-Block where he began. while on B-Block, Mr. Adams maintained compliance with his **opioid use disorder** medication, namely suboxone and his mental health medications, namely: **Seragvill** and **Rimron**. outside of keeping a Religious Book in his hand, Mr. Adams stayed on the phone trying to save his marriage and he attended Drug and Alcohol Group Every week. When he returned to his unit on 11-1-22, Mr. Adams was deliberately put in harms way and denied safety and equal protection as staff maliciously caused Mr. Adams to be assaulted by another inmate. The Bucks county correctional Facility itself also denied Mr. Adams the security and safety he is guaranteed under the Fourteenth Amendment by deliberately neglecting to fix the faulty locking mechanisms within the doors of the cells for years. This incident led to the retaliation of officers and staff across the facility and that led to the assault, battery, mental torment, beating, intentional infliction of emotional distress, slander, excessive force,

(11)



First Amendment violations as legal mail was search outside of plaintiffs presence, Read and censored, violating his Fourth Amendment of due process, Excessive searching, harassment, Being stripped searched in front of a female officer, searches leaving cell in disarray, Denying mattress for weeks, Denying shower for weeks, Being placed in feces cover cell after feces cover cell, A fractured nose, Torn ligaments in right hand, Torn ligaments in right shoulder, Swollen Face, Left Face contusion, Being stripped and left naked in front of inmates on two separate occasions, Food being spit in by staff, being given a feces and urine soaked mattress twice, medical staff being deliberately indifferent to plaintiffs medical needs, medical malpractice, negligence, Denied access to the courts, Denied access to attorney, unsafe condition, cruel and unusual punishment in violation of the Eighth Amendment, First Amendment violations denied visits and right to association and The Torture of Mr. Adams By being placed on the MHU unit where mental health inmates constantly bang and kick there doors and scream. Mr. Adams brings this Action pursuant to 42 U.S.C. § 1983 For violations of His constitution rights under the 14<sup>th</sup>, 4<sup>th</sup>, 8<sup>th</sup>, and 1<sup>st</sup> Amendment of the United States Constitution; The Americans with Disability Act, of 1990 ("ADA"), 42 U.S.C. § 12132; the Rehabilitation Act, 29 U.S.C. § 794; Pennsylvania Professional negligence Law, Deliberate Indifference under the Eighth and Fourteenth Amendment clause.



## FACTS

67. on 4/21/23 This complaint was given to public Defender **Michael HUFF** of **Montgomery** county, inside the court room at plaintiff's Arraignment Hearing. A manilla envelope containing a Handwritten 75 page complaint with 30 something pieces of evidence marked as exhibits. plaintiff Adams explained to public Defender **Michael HUFF** that He was being Denied access to the courts by Bucks county correctional Facility and told Him / Asked Him to mail off manilla envelope that Had 5 Stamps, off to the Federal court. Attorney **Michael Huff** of **Montgomery** county accepted the manilla envelope and stated He would Add whatever extra postage that was needed. plaintiff Has not yet Heard From Federal clerk of Court this 27<sup>th</sup> day of May, 2023 and so He's Refiling His complaint and what ~~HE~~ Has as He is still in the Hole. so if By chance another copy of this Tort Finds its way to this Honorable court, please accept it and all its evidence proving the Torture Im (plaintiff Adams) am still enduring. FIRST Filed tort Has other EVIDENCE

68. on November 1, 2022 at about 9:30am, plaintiff Adams Returned to Housing unit B-Block From (DNA) Group. He went to the phone room but was escorted to his cell (8-cell) by correctional officer G. Simpson. on His way to his cell, He got a soda From a inmate in 35 cell while officer



simpson Held His cell door open. He was Then locked in his cell.

69. officer simpson Returned immediately, opening and closing 8-cell door as He provided Mr. Adams with cleaning supplies to clean up after His detaining new cell mate that was placed in His cell 1AM in the morning.

70. A Argument Broke out Between officer simpson and the inmate in 9-cell about a institutional supplied Tablet. The inmate in 9-cell Told officer simpson How his old cell-mate Broke His Tablet and Mr. Adams stated From His cell that the statement 9-cell made was True. officer simpson then yelled, "Adams you're a switch and you've been Telling on the Block."

71. Defendant simpson Then yelled out and Addressed the block (who was already paying Attention) and Inmate "Boiling", Answered His call. Inmate boiling Then came over and began arguing with 9-cell and Mr. Adams in Front of officer simpson.

72. Inmate boiling Told Mr. Adams in Front of officer simpson, "Im going to beat you the Fuck up. I am going to knock you out and Kick your Teeth in your switch ass nigga." He Then got on Mr. Adams locked door and began yelling while officer simpson yelled at 9-cell.



73. Inmate Bowling Told Officer Simpson to walk off while He dealt with it situation (Mr. Adams). Being as Though Down stairs was locked in For the morning period and up stairs was out For Recreation, Mr. Adams did believe He was safe Behind His locked cell door. The Big metal door was locked and Both Tiers was not out For Recreation. Adams was where He was suppose to be and didn't leave.

74. defendant c/o Simpson Followed Bowling's orders and went to the Front desk and Then sometime later, He Returned to 8-cell and Asked Mr. Adams, "How'd He Just get in here? How'd this cell door open?" Mr. Adams Told Him, "you buzzed the door open I guess." Adams Then said, "you just opened it." and officer Simpson said, "not just now, when he was in here?" Referring to Inmate Bowling who assaulted Mr. Adams.

75. Plaintiff Adams Replied He didn't know and That the Last Thing He Remembered was Talking to Him. Three officers Then Removed Mr. Adams From the Block and placed him in a holding cell.

76. Plaintiff Adams began to complain about stomach pain and How he had to use the Bathroom. He was Forced to use the Bathroom on the Floor. He has a bullet in his stomach that prevents Him From Holding anything For a long period of Time.



77. Sgt. A. Cruz met Mr. Adams in medical and asked him what happened. Mr. Adams replied, "I don't know, I was attacked and woke up with my jumper off." Sgt. A. Cruz said, "So he attacked you?" Mr. Adams said, "yes! He was locked in his cell and then woke up in his cell." He then told "Cruz" he needed to be checked out by medical (referring to a rape kit). Sgt. A. Cruz denied plaintiff medical examination and placed him back in the holding cell.

78. Mr. Adams seen Sgt. Pohopia and said, "your officer is calling me a snitch and he just buzzed a inmate in my cell and allowed him to attack me. I couldn't run, I couldn't call the police for help and I wasn't even able to fight or get help from the guard, please look at the cameras."

79. Plaintiff Adams was placed in the BHU on a medical watch where another inmate sat at his door and watched him. He was written up for fighting when he was not fighting. He wrote a grievance on line paper and the monitor on his door wrote a grievance on yellow paper for Mr. Adams. (Video Footage will show all).

80. On 11/2/22 at about 1:30am, plaintiff Adams was informed that inmate Borling broke into his cell. Adams immediately wrote a grievance to Deputy Reed and Superintendent Metellus about the faulty locking mechanisms within the cell  
(16)



doors. It was brought to his attention by officers that, the institution has been aware of the problem with how all the cell door's locks are faulty and malfunctioned.

81. It was brought to plaintiff Adams attention that, inmates had been receiving misconduct reports for years for popping the locks or tampering with the cell door locks and placed in the RHU because of it.

82. Inmate Borling was seen on camera, popping Mr. Adams cell door lock from the outside and breaking into plaintiff Adams cell. Inmate Borling was "written up" for breaking into Mr. Adams cell and for fighting. He has (as of this date 5/27/23) several misconducts for breaking into inmates cell and stealing their property and fighting. This is his M.O!

83. Defendant % Simpson lied on his misconduct report stating he was stocking toilet paper. He also lied about inmates fighting as Mr. Adams was not fighting.

84. Defendant Dittman (The misconduct hearing examiner) lied and stated Mr. Adams was seen fighting on the video footage. Mr. Adams knows this to be true because, "he was not fighting", and also because L.T. Thompson stated he was not seen fighting on video footage and could not see why Adams was found guilty.... (of fighting). (L.T. Thompson is not a defendant in these matters).



85. plaintiff Adams Filed an appeal that came back Forged By L.T. Clayton who, Rewrote and Altered plaintiffs Appeal and Then sent plaintiff the actual newly written document with wet ink. please see Exhibit 1 in plastic. This ink was Transferred onto this Tissue. Inmate are not given this type of pen Ink from this type of pens. plaintiff Believes the pen ink on this sticky not in Exhibit 2 is the same ink.

(Evidence is with First complaint that was given to Public Defender Michael Huff of Montgomery County to mail on 4/21/2023. please see COURTROOM video Footage For Transaction Between plaintiff and counseor).

86. on 11/2/22 officer Franklin Williams began to call Mr. Adams out of His name, Trying to Amuse other inmates that was housed on the KHU-unit. Adams didn't Feed But Had words with the inmate monitor. The Argument made The inmate monitor cry and After a few more words of degradation from Williams, the days verbal Assault ended.

87. on 11/3/22 % F. William began to call Mr. Adams out of His name more disrespectfully then he had the day before. Mr. Adams Asked % Williams to stop calling Him switches and Faggots and Homo muslim man and nigger. Mr. Adams Told Williams, "I'm not your nigger or none of that." Inmate carrol began crying like a baby, Teaming up with officer Williams and



Attacked plaintiff. Adams said, "stop calling me nigga, that racist." and Williams said, "Im Black, I can call you nigga as much as I want nigga."

88. on 11/4/22 plaintiff Adams was Threatened by Officer Williams. Williams Told Mr. Adams He was going to shoot Him. Williams also Told Mr. Adams He was going to get His wifes address From his visiting list and Then go see Her and "Fuck" His wife in Front of His son. Mr. Adams wrote a green Request slip to Deputy warden Kelly REED, Asking For Help and To Tell C/O Williams To stop Bully him and calling Him a switch. He (Plaintiff Adams) Told How C/O Williams was Telling inmates inmate Boiling beat Him up and How He was a Rat

89. on 11/4/22 Mr. Adams asked For a grievance in His Request slip to Deputy warden Kelly Reed. A Formal grievance. staff at Bucks County Tells inmates to write their grievances on Regular paper. Mr. Adams has done that as well and it was written/Reported To Deputy Kelly Reed.

90. on 11/3/22 Mr. Adams Appealed his misconduct as staff had instructed him and The appeal Took over Two weeks To come Back. The Appeal Came Back Forged with wet ink. Enclosed is a (piece of Tissue) with the wet ink Transferred to it wrapped in plastic. Plaintiff Believes the ink is the same as Exhibit 2. Also that



Blue ink is not the same blue ink plaintiff had to write his grievance (see exhibit ( ) - Appeal to SpdT. Metellus) "Evidence is with Test That Attorney Michael Huff of The public defenders office in Norristown PA was suppose to mark. plaintiff Adams Filed a motion To Compel on 5/24/23 see civil no 2:23-cv-01178-JFM For motion".

Every day Williams Threatened, called swtokes, Faggets and even got on Plaintiff's cell door and Taunted him, Laying it on heavy. 91. on 11/9/22 plaintiff Adams wrote a grievance To deputy, defendant Kelly Reed, about Being Denied the Law library To Research and litigate His case. Sgt. Pohopia Denied plaintiff Adams Law library again on 11/15/22 when Mr. Adams asked To use the Tablet where He could use "Lexis nexis To Research HIS case. plaintiff Adams Request For a power of Attorney Form was Denied by Law library.

92. on 11/9/22 plaintiff Appealed His misconduct To SpdT. Metellus and stated that he was not Fighting. He complained about the Faulty Locking mechanisms in the door and How it should have Been secure enough To keep a inmate From Breaking in and Assaulting Him. He also complained about officer Simpson not Telling Inmate Bailing To stop. plaintiff Told How officer Simpson didn't Rush To his Aid nor did He call a code 99 For Help.

93. plaintiff Adams Told SpdT. Metellus about How the security door that was suppose To protect him Didn't and He complained about the Faulty Locking device/Lock



within the doors and, He asked to be released from the RHU. plaintiff requested to press charges on both officer Simpson and Inmate Bowling in letters to metellus.

94. Between the dates 11/9/22 and 11/20/22, plaintiff Adams wrote several request slips complaining about defendant C/o Franklin Williams calling him Faggots, switches, Homo muslim, Homo muhammad, niggers and threatening his life and the life of his wife and children. on one incident that occurred on a Wednesday, while Mr. Adams was in the down stairs shower, Defendant C/o Williams held his keys silent and eased up on the side of the showers outer wall and pecked around the corner. Mr. Adams complained how that was weird to Sgt. Raggi who was there trying to provoke plaintiff along with C/o F. Williams. Mr. Adams was escorted to his cell - 15 - without incident.

95. After Mr. Adams was in his cell officer Williams made his way to the Top Tier and began threatening Mr. Adams from outside of his cell door. Defendant LT. Whitesall caught officer F. Williams threatening plaintiff Adams and saying he was going to "shoot plaintiff and shoot his son and make sure he (the son) never see 18 years of age. plaintiff snapped and was unable to get under control for some time. (see top tier video footage)

96. Later that evening, medical checked on Mr. Adams and took his blood pressure then examined his face to make

(21)



sube He wasn't having a stroke. "plaintiff was being slipped different medication during this time by nurse Eva and didn't know it. Blood work done at Doylestown Hospital can prove this."

97. plaintiff Adams wrote a grievance on plain yellow paper about C/O F. Williams insulting him to his penis. He complained about Williams continuously picking on him, Singling him out and antagonizing him. Bullying him for weeks. He told about all the threats, and humiliating names from niggas, Faggots, Bitches, pussy's, Homosexuals, Homo muslim, Homo muhammad, switches, Kats, and more. This grievance was sent to Deputy warden Kelly Reed.

98. on 11/21/22 Defendant C/O F. Williams entered plaintiff Adams cell while Adams was in the shower, (something he had never done since Adams was housed on the RTHU unit). Adams looked out the shower and seen Williams coming out of his cell and yelled "why you in my cell." Mr. Adams got out the shower and was take to his cell where he noticed His Quran Tossed on the Floor under the Toilet. There was a white substance smeared on the right hand corner of Mr. Adams religious paper, see Exhibit titled (1. Ayatul Kursi) for stain of substance on paper. (Exhibit in manilla envelope handed to public defender Michael Huff to mail on 4/21/22. please see courtroom security Footage of plaintiff



giving counselor envelope with 5 stamps on it to mail to Federal courthouse. plaintiff deliberately held package up to camera).

99. Plaintiff Adams called C/O F. Williams (who was already on to Tier). After Williams told other Kookie officer to leave, He approached plaintiff Adams door and said: ("what pussy?") plaintiff Adams said: "why you Toss my Quran on the Floor? and whats This white shit on my papers?")

100. Defendant C/O F. Williams said, "why Allah aint stop me, huh Fagget? you bitch ass nigga what you gonna do about it?" Adams said, "you Bitch, open my door. you Tossed my Quran? whats this white shit?"

101. Defendant Williams said, "you squat 600 pounds pussy, Kick the door open and see How I Beat you Fagget ass. Why Allah aint stop me From Throwing ya' Quran? you Fagget, now do something. write another grievance bitch. contact the investigators nigga. Im a different breed, I'll murder you, your kids and whoever. I aint from around here Fagget. where Allah at now?" (Footage will show William Tormenting Adams)

102. plaintiff Adams Began Kicking the cell door while screaming "Allahu Akbar". He continued to Kick the door until the door broke open because of the faulty locking mechanism  
(23)



of the door. The Faulty Lock that plaintiff complained about To deputy Reed and Superintendent Metellus, popped open. plaintiff Ran down the steps with a pole in his hand. He dropped the pole before he reached officer Williams.

103. plaintiff Adams was moving so fast that He could not stop His Forward momentum. so while running, he leaped over the chain To keep From crashing into it. Officer F. Williams immediately grabbed Mr. Adams Left leg and plaintiff sprawled immediately To keep From being lifted. Mr Adams yelled, "Leave me the Fuck alone", while he took the Top position. He used His hands To push Williams off his leg using a sumo style push.

104. while defendant Williams laid on the Floor, Mr Adams got away From Him and went down in surrender immediately while officers ran onto the unit. Mr. Adams laid on the Floor and remained motionless.

105. Defendant C/O South Tried To murder plaintiff with a spear Headbutting upwards Tackle aimed at Mr. Adams Exposed Defenceless Face; and miss where, He crashed into The Floor Face First. He did not Follow protocol and yell ("stop, get down, surrender") when he ran on to the block. nor did He need To when plaintiff Adams was already going down in surrender. Officer South maliciously and sadistically Tried To cause serious bodily Fatal injury To plaintiff Adams By Turning Himself



into a Human projectile with the intentions of hunting a defenseless man. (video Footage will show this exactly).

106. plaintiff Adams laid on the floor motionless while C/O defendant John Doe #2 punched him in the face immediately while he was handcuffed. (This defendant wore blue gloves). While still handcuffed defendant C/O Schuster knee Adams in the head. He then knee plaintiff Adams in the face, tearing skin off his left temple. Adams was then punched in the face again and then punched in the nose, causing his face to explode with pain. (see entrance video Footage).

107. 6 OR 7 officers was on top of plaintiff Adams while he was attacked by Schuster who used two officers for leverage to make his blow more powerful and guided. He was then lifted from the floor and taken off of the RTH unit, where LT. Thompson and C/O Hitchens took him from the assaultive officers and took him to medical. (see preliminary Hearing & prison video Footage)

108. plaintiff Adams Face was looked at and medicine was applied to the open wound on his left temple. He complained about his left eye burning and blurry. nurse Linda applied cleaning solution to the confusion. He complained about not being able to breathe out his nose. He told the nurse, "They beat me while I was handcuffed, in one man". (Investigator Anthony took a photo of plaintiff's open wound on his face where he was knee.)



109. nurse Linda cleaned His Face, shook her head and Tried Soothing plaintiff who had Tears Falling From His eyes. He said His Eyes were Burning and not to mind Him.

110. on 11/21/22 plaintiff Adams was Transported To mHu 3 cell and Stripped Search where a packet of Crushed medication was Found on him. He Admitted it was His medication. Adams was saving His medication like officer Williams Had Told Him to do so, He could Attempt suicide again. while Housed on RTHU, officer Franklin Williams Heard Adams Tell a Inmate How He Attempted Suicide in the past. He Then Told Adams To "save all your psyche meds and Kill yourself. Take Them, I wont call a medical emergency. Hang your-SELF while your celly at yard From the bunk, I wont save you." plaintiff was going To commit suicide To stop officer Williams From Tormenting Him. see attached Exhibit (misconduct). plaintiff was indeed going To Kill himself on more Than one occasions. Reasons will be listed within this complaint. (To stop Torture)

111. The cell plaintiff Adams was placed in was covered with Feces and urine. The mattress was soaked and dripping urine and cover with Feces. plaintiff complained about numbness in his left leg and Arm and Requested medical. Sgt. A Beck, officer Geibert and The Third Defendant c/o John Doe #2 Responded and



Forced Adams To hop on one leg To the Tray slot. He was Handcuffed Backward and once The door opened, defendant Sgt. A. Beck, defendant C/O Geibert and C/O John Doe #2 Aggressively slammed plaintiff Adams on the Hard plastic Bed Frame and put leg irons on Him.

112. Plaintiff Adams screamed as defendant Sgt. A. Beck clenched the cuffs on His waist By smashing his weight on Them and Then forcing it closed even more after that. plaintiff Adams screamed and cried from the pain of the Handcuffs. The nurse just looked from a distance and did not examine Mr. Adams.

113. plaintiff cried to be set free and so defendant C/O Geibert cuffed the leg shackles around the center of the Handcuffs and Then with defendant Sgt. Beck, swatched Mr. Adams Through the Tray slot. plaintiff Adams Fell To the Floor with His Arms and shoulders Hyperextended, (Bulled up as He sat suspended) in the Tray slot and Sgt. Beck laughed as He hung there for a Bit.

114. The Three defendants opened the door and plaintiff Hit the Floor crying. Sgt. Beck yelled don't move. C/O Geibert Steppingly Kicked Adams in the Face like he was Trying To Step above his head. Adams laid inbetween the wall and Toilet. Mr. Adams was dazed but still aware of what was going on To Feel someone punch him in the back of the head with a closed Fist.

(27)



115. once plaintiff got Himself Together, He Felt His shoulder was out of place, His Elbow was in pain. His Hands was also in great pain and There were cuff marks deep into His wrist. He couldn't Breathe out of His nose and His vision was Blurry. He wrote medical. see Exhibits (Exhibits are in manilla envelope given To Attorney michael Huff on 4/21/23 To mail.)

116. on 11/21/23 plaintiff Adams Told officer, Defendant M. Gray that he did not get Lunch nor dinner. plaintiff Adams saw the Kitchen officer and Told him, and a Food Bag was Brought To the MTH unit. plaintiff watched Defendant M. Gray open the Food Bag and Hog Spit into it and Then Bring ~~It~~ To him.

117. on 11/21/22 plaintiff Adams Received a misconduct Report with the incident # 22-1121-865 and that misconduct Report stated the Following: "on 11/21/22 at 1010 inmate Adams, Robert began to Kick cell door BTHU 15. After about 7 or 8 Kicks BTHU door is open. Inmate Adams ran out of his cell holding a metal pole Inmate Adams swung the pole at my head, He also Tried To punch and Kick this officer. code 99 was called inmate was Escorted off module," see exhibit 5-BTHU misconduct. (Exhibit was Filed with 1983 civil rights complaint The was handed To Michael Huff - Public defender of Norristown montgomery county, - To mail on 4/21/22. Court Room Footage will show plaintiff giving mail To counselor).



117.5 While Plaintiff Adams was on the MHU unit, He suffered a great deal. Everyday He begged each and every supervisor namely: "Deputy Kelly Reed, LT. K. Wylie, LT. M. Clayton, LT. C. Hugg, LT. J. Whitsall, Captain Nottingham, Sgt. W. Murphy, Sgt. M. Raggi, Sgt. A. Beck, Sgt. V. Cruz, Sgt. C. O'Donnell, Sgt. R. Evans, Sgt. K. Kinkelin and John Doe #3 whose a Lieutenant," For a mattress because it was extremely cold sleeping on the bed frame. Plaintiff Adams begged for a hot or warm shower every day and was toyed with by C/O Swan, C/O Black and Sgt. C. O'Donnell for their amusement like they were going to give plaintiff a shower.

Defendant K. Kinkelin intentionally moved plaintiff Adams out of MHU-3 cell and into MHU-2 cell that was covered in feces and urine. Inmate Dudley had just been taken to the hospital and he was a mentally ill inmate who laid it waste and tossed it all over the cell. Inmate Dudley never once cleaned that cell. Adams begged not to be placed in that cell and was threatened with pepper spray and the confiscation of his property if he didn't move.

Plaintiff posted numerous letters/requests and grievances on the glass of the cell doors for the rotating camera to read, begging for a mattress, a shower and his legal mail that was illegally confiscated due to a policy that stated, legal mail not from Bucks county was to be taken.

Plaintiff wrote constitutional law on those posted documents and sent copies of those grievances and things to Deputy Reed and Superintendent Metellus. Video recording will show officers and supervisors reading those documents and was very aware of the



11/7/25 cruel and unusual punishment that plaintiff Adams was going through. on 11/26/22 Plaintiff Became sick and Requested medical help. while Being Transported to medical, Plaintiff Began To Regurgitate. He was slung back in His cell where He Threw up even more inside the Front of His door. He then lost consciousness. A medical emergency was called. video Footage will show Lt. Wylie, Sgt. Murphy and nurse Jammie, slamming plaintiff on stretcher while Handcuffed violently and over excessively, done maliciously To Hurt plaintiff.

Defendant % Brassells lied and said "spit" vomit got on Him when, He was standing 4 to 5 Feet Behind Officer Hernandez who, immediately Responded as if Fluid inadvertently got on Him. Defendant Brassells on the other Hand, who was standing By the Computer monitor, couldn't, <sup>could</sup> not have been effected as physics does work. How He said not did He Respond like someone who got wet with vomit or "spit". Brassells Falsified court documents and lied on stand. video Footage shows He was not effected.

plaintiff Asked For Help From Supervisors Each and Every passing day. video Footage will show This.

on 11/26/22 Sgt. Murphy and Lt. Wylie stripped plaintiff naked in Front of inmates and left him naked in Front of them To humiliate plaintiff. on 11/28/22 They both stripped plaintiff naked and left him in Front of inmates again, naked To degrade and humiliate plaintiff.



Inmate Lopez was transferred to a Hospital sometime in January Lopez 031833. During The 2 to 10 shift, Sgt. O'Donnell came to plaintiff Adams cell - MHU 5 - And Told Mr. Adams to pack His stuff Because He was moving to 8 cell, "where Lopez" Had just been Transferred From. Lopez 031833, who was wheel chair bound, was a Inmate who urinated on Himself, on the Floor, on the mattress and everywhere Else. He Took no showers Ever. He pooped there on himself and Then Took the Fees and Tossed it Everywhere.

plaintiff Adams Told Sgt. O'Donnell, "I'm not moving down there! why are you people Fucking with me? I was just Transferred Back here and I haven't said A single word to any of you".

Defendant Sgt. O'Donnell said, "IF you don't move I'm going to pepper spray you."

plaintiff is Aware of How Sgt. O'Donnell likes to pepper spray Inmates. He does it to hurt and Harm Inmates with mental issues who don't even Been unhurt on a Threat To the security of the Facility. plaintiff Told This Defendant, "IF you Try to hurt me, I will destroy you and whatever stuff you bring with you. I'm not moving in that shit covered cell after I just scrubbed this one clean. you spray me with that pepper spray For nothing and I will Fuck you up be it now or later." plaintiff Then began to pack all His legal mail in manila envelopes. once That was Done

29.2/5



Plaintiff Adams wrapped a shirt around his nose and mouth area and then he wrapped a towel around that and tied it behind his head. He put on his entire sweatsuit and then put a weapon in each of his hands and watched Sgt. Odonnell call his superior. Because of Sgt. Odonnell's closeness to plaintiff's door, he could hear Odonnell being yelled at over the phone. Plaintiff's tray slot was then closed. Sgt. Odonnell turned beet red with anger as he left the unit. Plaintiff Adams stayed up on guard all night as FEAR of being placed in another feces covered cell overwhelmed him. Thoughts of suicide began to dance on plaintiff's mind due to the constant abuse he's endured by staff and Bucks County officials. Having no family contact for so long makes plaintiff Adams believe no one loves him or cares. Even state inmates get a phone call once a day or week while in the RTHU and both RTHU and Death Row inmates are allowed visits while on RTHU status. Bucks County violates plaintiff's First Amendment Rights and Eighth Amendment Rights and Fourteenth Amendment Rights by denying rights to association by denying visits. Plaintiff is a pretrial detainee who has been in the hole since 11/1/22 for something he didn't do which is false imprisonment. He was given 20 more days without a misconduct hearing. He never asked plaintiff if he wanted to participate in a misconduct hearing but stated: "I called and heard Co. Butler ask you and you said no". That's impossible to hear me in a cell, locked behind a steel door, across ten feet of floor, through the sound of the television, through the phone. Impossible.



118. on 11/21/22 Inmate Lopez 031833 was Removed From cell 3 and placed in cell one. Inmate Lopez is a Inmate who urinated and defecated in place and shung it on walls and all over the cell. His mattress was saturated with urine and feces and Mr. Adams complained to L.T. Wylie (After He mistakenly laid on it not looking and got soaked and stained). L.T. Wylie removed the mattress out of the cell and did not replace it.

119. on 11/22/22 plaintiff Adams submitted a sick call and stated he needed medical attention for his elbow, a concussion and a dislocated shoulder.

120. on 11/22/22 plaintiff Adams submitted a sick call slip stating he was having vision problems with his left eye where Officer Schuster Kneed him. He explained and complained about a large knot on top of his head, How his hand was numb, a large lump on shoulder and How He couldn't breathe out of his nose.

121. on 11/22/22 plaintiff wrote a grievance and posted it to his doors glass so that the rotating camera could capture it. The grievance was to Ms. Reed. He sent He a copy as well.

**NOTE** ( Please Be Advised That Due To medical Issues with plaintiffs Hands, The page number after This 29<sup>th</sup> page and 30<sup>th</sup> Page with the Paragraph will Drop to page 19 (29)



Paragraph (92) and Then move Forward From There. Also Plaintiff's Exhibits that are mentioned in this complaint are with the First complaint He Fashioned and Gave To public Defender Michael Huff of Norristown Montgomery county, Pennsylvania To mail For plaintiff on 4/21/23. Michael Huff Agreed To mail The Sealed Manilla envelope That was Addressed To The UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA, 601 MARKET STREET, PHILADELPHIA, PA 19106, ROOM 2609. The envelope HAD Five STAMPS ON IT And Plaintiff Deliberately Showed The Court Room Camera The Sealed Manilla Envelope. plaintiff Talked To the Federal Clerk of Court and was informed That Hes 1983 civil Rights complaint against Bucks County Correctional Facility and 57 to 64 of its officers was not Received. Plaintiff Adams Filed a motion To Compel Attorney Michael Huff To Turn over Plaintiff's legal Documents and Exhibits To the courts. Plaintiff now hereby Files another 1983 against Bucks county and as much evidence That He Has. There is A Amended Complaint and Documents with a memorandum of Law Attach To this package and complaint. Plaintiff Respectfully Request That (once Michael Huff delivers That First complaint plaintiff prepared against Bucks), it Be accepted and Added To this as There's other Evidence within the paragraphs of those Pages. And There's Evidence within these pages. Thank you kindly and Respectfully: Robert L Adams  
(30)



92. on 11-22-22, Mr. Adams breakfast bag that contained dry cereal and dry cake was saturated with ~~Tabacco~~ spit juice and piece of chewing tobacco. He said something to D. Connor and Connor said, "you're lucky it's just spit".

93. on 11-23-22 Mr. Adams begged for a mattress and a shower. He was denied. He asked for a meal that wasn't spit in and he was denied.

94. on 11-26-22 Mr. Adams had become sick after being placed in another cell, i.e. 2 cell that was covered in feces and urine. Mr. Adams requested medical while being taken to medical Mr. Adams through-up. Some got on a inmate and allegedly 2 officers. He was placed back in his cell where he continued to regurgitate. Then he lost consciousness. A medical emergency was called and the medical team took Mr. Adams off the unit on a stretcher. See video footage from the rotating camera date 11-26-22 to see (vomit on the floor inside the cell (2) at the door) and see medical log for medical code being called. For two days straight Mr. Adams slept. (no way vomit could have hurt Brassell's).

95. on 11-26-22 Sgt. Murphy and L.T. Willie stopped



Mr. Adams Naked For no reason, after He returned to His cell from medical, and left Him naked in front of inmates For a period of Time. Lt. Wylie also had nurse Jamie put Mr. Adams on a watch where all His property would be taken out of His cell.

92. on 11/26/22 nurse Jamie Acted with deliberate indifference and indulged in malpractice by placing Mr. Adams on medical watch For Lt. Wylie abuse to Mr. Adams. Mr. Adams was forced to freeze in that cell. Mr. Adams continued to beg for a hot shower and a mattress.

93. on 11/27/22 Mr. Adams and 11/28/22 Mr. Adams slept due to being severely sick and cold. He asked For a shower and A mattress but was denied. Adams was forced to sleep on cold bed frame for weeks, be frame is harder and colder than the floor.

94. Mr. Adams Asked Lt. Clayton and case manager Webb For a grievance and They both told Mr. Adams no. Mr. Adams wrote captain Nottingham and Asked For help, For a shower and mattress but His cries For help fell upon deaf ears

95. on 11/28/22 Mr. Adams was Transported to court By the Bucks County sheriffs. The sheriffs noticed how badly Mr. Adams appeared as He struggled to walk.



96. Mr. Adams was next Found on the holding cell Floor convulsing and unresponsive. The EMT's was called and Mr. Adams was Transported to Doylestown Hospital where He was seen and Treated For several injuries. An XRAY of His Right hand and Right shoulder was Taken and Two cat scans was Taken To make sure there were no Bleeding on His Brain. (Sheriff woodard and Klein Took excellent care of Plaintiff of Berks county sheriffs)

97. XRAYs showed Torn ligaments in Mr. Adams Right hand, A cyst had Formulated on His Right shoulder and outside of being ~~dehydrated~~ a Fracture To his nose. Mr. Adams was Also given medicine For a infection and discharged. During the cat scan of Mr. Adams Head, He again had Threw-up and grabbed at His mask. Sheriff woodard grabbed His (Mr. Adams) Free ~~HAND~~ until He realized what Mr. Adams was doing. (Lt. Wylke and Sgt. Murphy stripped Adams naked and left him in Front of inmates again to humiliate him) 11/28/22

98. on 11/29/22 Mr. Adams Placed a note up on the Glass of His cell For the camera To Read. The note stated: "MAY I Please get my legal-work That I went to court with? The sheriffs Returned my manilla Envelope containing Legal Documents of mines! MAY I Also get a Shower? Cruel & unusual Punishment is prohibited under the 8th Amendment of the UNITED States OF AMERICA CONSTITUTION." please see exhibit 6

99. on 11/29/22 Mr. Adams submitted a Request/grievance To Deputy warden Kelly Reed, requesting To be 7'ed out of



Becks county Correctional Facility due to the Inhumane conditions and Abuse He endured From the staff at Becks. He did indeed complain about being forced to sleep without a mattress for weeks, His Food being spit in, His phea Rights being violated, Him physically being beaten, Him being denied proper medical Treatment, Him being denied law library, being denied showers and being forced to freeze. please see exhibit 9

100. ON 11/30/22 MR. Adams<sup>Wrote</sup> The Following note and posted it for the camera to read: "my name is Robert Adams! I have been denied humane conditions such as a mattress that meet CDC Health codes & Regulations, i.e without being saturated with urine & feces", and I've been denied a mattress to sleep on which is inhumane. I've been forced to endure hate crimes against me by staff & inmate alike, my phea Rights have been violated where I was stripped by staff twice and made to sit naked in front of inmates without proper attire. I was forced to take my medication naked. I been denied a shower and my legal work has not been returned to me. The sheriffs returned it to the prison. I plead to bathe in warm water, to shower, please! my Human Rights, prisoner Rights, phea Rights and Constitutional Rights have been violated. This is torture & Against The Law. sincerely Robert Adams 074562 see exhibit 10

101. ON 11/30/22 A Request/Complaint was written by  
(22)



Mr. Adams and sent ~~to~~ Ms. Kelly Reed. Mr. Adams deeply expressed himself and asked to have a meeting because he was tired of beatings, and all the other cruel and inhumane things he was enduring. She, Deputy Reed responded and stated she would look into complaint. See Exhibit 11 (with first filed complaint given to Michael Huff on 4/21/23).

102. ON 12-5-22 Mr. Adams wrote a grievance on plain line paper about Lt. Hugg violating his 4<sup>th</sup> and 14<sup>th</sup> Amendment of the United States Constitution and his 1<sup>st</sup> Amendment by opening his legal mail outside of his presence, searching it, removing legal material and then giving Mr. Adams his legal mail, open and missing legal material that could have vindicated Mr. Adams in his parole hearing that was held inside Bucks County Correctional Facility's Gym Room via Telecommunications video. Lt. Hugg removed legal documents that did not come from Bucks County and documents that did not have the county of Bucks name printed on it. (see video footage)

103. Bucks County Allows legal mail from other districts to enter the jail via mail. Bucks County Correctional Facility conducts legal court hearings from other jurisdictions via video conference in the Gym. Bucks County prints case law and other legal material that does not derive out of Bucks. How can Bucks County then have a policy that renders



it permissible To violate my 4<sup>th</sup> Amendment of due process? How can it be legal For my legal work To be censored and Taken away From me? I was unable To defend myself during my Technical parole violation hearing properly nor could my attorney as, I could not provide needed documents To the parole Board of Pennsylvania nor could I call witnesses. my legal mail Being search, and Taken, While not in my presence Denied me access To the courts, violated my Attorney client privilege and caused me To Lose my parole Hearing as I could not provide needed documents and witness numbers.

104. Mr. Adams has Been Denied access To the courts, violating His 4<sup>th</sup> and 14<sup>th</sup> Amendment of The United States constitution. Mr. Adams Account Has been suspended by the Jail and He has Been denied Access To the Law library Lexis App on the Tablet. He has Also been denied phone access so He can not call His lawyer.

105. Mr. Adams is denied access to get Hygiene products which is inhumane and cruel. Mr. Adams is denied Access To go to the RTHU commissary.

106. Mr. Adams Has been denied yard and as of Today 4/10/23 has been To the RTHU yard Twice in 5  
(24)



months. Mr. Adams Ask For yard Every day.

107. Mr. Adams Asked For All of His legal work and placed it on glass door For camera To see. see Exhibit 12 For Adams Asking For legal mail.

(with First Filed complaint 4/2/23 given To Attorney Michael Huff <sup>TO mail</sup>)

108. on 10/30/22 Mr. Adams wrote a grievance To Deputy warden Kelly Reed on Regular paper about His Job in the institution. Deputy Reed Responded To His Grievance. please see Exhibit 13 For (Proof that staff do respond to grievances wrote on Regular line paper). (Attorney Michael Huff 4/2/23)

109. on 11/30/22 Mr. Adams was Denied a shower by Sgt. O'Donnell and correctional officer Black. on or around about date Mr. Adams Asked Sgt O'Donnell For a few cups of warm water To Bathe with. Sgt. O'Donnell said yes But correctional officer SWAN Denied Mr. Adams a couple of drinking cups of warm water To wash with. (Sgt. O'Donnell then laughed and denied plaintiff)

110. on 12/6 or 7 or 8/22 Deputy warden K. Reed and Captain Nottingham came To the MTHU unit where Mr. Adams was being Housed at on RTHU status. There was a meeting where Mr. Adams Told Both Captain Nottingham and Deputy Reed what's been going on. Deputy Reed Retrieved a lot of Mr. Adams grievances To him That was written on green slips and said, "lets get ya



111. you a mattress." Mr. Adams cried, "you people are killing me and treating <sup>me</sup> less than a human." Mr. Adams then asked for a formal grievance and Deputy Kelly Reed told him to wait to next week, fully knowing that Mr. Adams wouldn't be in the facility the following week. Captain Nottingham was aware of this information as well and said, "lets get you a mattress."

112. LT. clayton opened up the back closet and the smell of pure putridness filled the entire MTU unit and all the cells. LT. clayton then gave the mattress he pulled out of the closet to Mr. Adams and laughed "shit tight I meant sleep tight." Feces was stuck all over the mattress and it was stain with urine. Mr. Adams then asked officer Butler for cleaning supplies.

113. officer Butler laughed at Mr. Adams as he taunted him about giving him cleaning supplies and then at 12pm, gave him a scrub brush, spray bottle, dust pan and scrubber. (see video footage from rotating camera)

114. Mr. Adams scrubbed that mattress with soap, chemicals from the spray bottle and toothpaste for two hours (please see rotating camera footage) and the mattress still reeked of urine. Feces was dried to mattress and defendant clayton clearly saw it.



115. Mr. Adams Then Rolled the mattress up, Tied His orange Jumpsuit around it and Then put a Tee-shirt around it and sat it By the door. The smell of urine continued To Fill the air, And cell.
116. Mr. Adams was next given a shower where, He stayed in For over a hour scrubbing Himself.
117. Mr. Adams wrote Deputy warden Reed and asked For an official grievance and on 12/13/22, Mr. Adams was Tx'd To George W. Hill Correctional Facility in Delaware county pennsylvania where, He underwent another set of Handships. Mr. Adams was Transferred To A Facility that He had never been To nor was He Facing any criminal charges There.
118. While at George W. Hill Correctional Facility in Delaware county pennsylvania, Mr. Adams Filed grievances against Bucks county Correctional Facility in Doylestown Pennsylvania.
119. Because of Bucks county Correctional Facilities Failure To protect Mr. Adams, Mr. Adams was Forced To go Through medical complications at George W. Hill Correctional Facility and Mr. Adams was Hospitalized Because of those complications. please see Adams v. Delaware county et. al 2:23-cv-01178-JFM X-ray's Revealed Mr. Adams Had a Fracture nose That He obtained From staff Beating Him at Bucks



120. ON 1/18/23 MR. Adams was Transferred back To Bucks county Correctional Facility on Judges orders, and placed back on the MHU in 5 cell. 5 cell Had some Fecal matter on the walls. MR. Adams used Soap and water and a hand held scrubber To clean with.

121. MR. Adams Has been Harassed By staff since He's been back in the institution and up until this very Day 4/12/23 He continues to be Harassed. MR. Adams IS on BHU status until June 26, 2023 and Every morning at 3am, His cell is searched and Ransacked By officers. MR. Adams sustained 3<sup>rd</sup> degree burns From shower and Received medical Attention. (Date now 5/29/23)

122. MR. Adams cell Has been searched and on most days Ransacked For over 60 days straight with The Exception of 1 maybe 2 days Thus Far.

123. Officer Clarke searched Adams cell and Ransacked it while Sgt N. Cruz was present and Then began to call MR. Adams a bunch of pussys, bitches, faggots, cowards, rats, and Threatened How He would harm MR. Adams. It is clearly seen on video recording Clarke antagonizing MR. Adams. MR. Adams clearly got upset and Sgt N. Cruz is clearly seen getting in Adams Face Telling Him not To Respond and sit down. MR. Adams Told Her To Tell Clarke To stop calling Him out of His name. She did not order Him to stop



124. Officer Clarke took Mr. Adams cell up a few days later when he came at 3 am with Sgt. Beck. He then began to threaten Adams and took a step towards Adams as if to hit Mr. Adams and Sgt. Beck is clearly seen holding Clarke back with his hand. Both Sgt. Beck and Clarke continued to taunt, antagonize and harass Mr. Adams during his medication period.

125. Mr. Adams cell was searched the next morning by Officer Miles and Harrison who stopped searched him in front of Sgt. N. Cruz who is a female. No contraband was found that day either. Mr. Adams complained about being stripped in front of a female and he complained about being searched every day.

126. Mr. Adams cell was searched by Officer B. Butler at 3 am and Mr. Adams complained to the Sgt. about the excessive searches that happened everyday.

127. Mr. Adams cell was searched by Officer Geibert and Miles and then Mr. Adams was stopped searched in front of Sgt. N. Cruz a female officer. Mr. Adams complained about being searched. Mr. Adams told the Sgt. she could write a memo about Mr. Adams being searched everyday. She stated she was going to search of (the cell) everyday anyway.



128. Mr. Adams cell was search By officer Romano who Ransacked His cell and Took paper that contained legal documents. Mr. Adams complained about the searches.

129. LT. Hugg search Mr. Adams cell on 4/9/23 and Ransacked it. Mr. Adams asked, "Why am I The only one being searched Everyday?" It was Told. because He Takes Subarone medication. Mr. Adams stated: ("Alfonzo Sanchez - 095098, SEI number QNB700) Takes Subarones in 4 cell and His cell is never searched. Now is he cuffed and Brought outside of His cell. you don't search no one cell over Here but mines.")

130. Mr. Adams cell was searched By officer Smythe and Mr. Adams complained about the searching His cell again. Officer Smythe did not Ransack Mr. Adams cell but stated, ("you should just be silent and file whatever paper work your going to file because you know your cell is going to get searched anyway.")

130. Mr. Adams sell was searched By Sgt. K. Kinkelin and He complained To her about the constant searching. She Replied, "I have To search the cell and Follow orders." Mr. Adams Replied, "you only search my cell when I Take my medication in the morning like your Trying To deter me From Taking my meds"



ON 4/21/23 Defendant Kasyphzik search @ 3am and mixed up plaintiffs legal work and stepped on legal papers  
 ON 4/22/23 @ 3AM Defendant Smythe searched plaintiffs cell.  
 ON 4/23/23 @ 3AM defendant Sgt. N. CRUZ searched plaintiffs cell.  
 ON 4/24/23 @ 3AM defendant Sgt. N. CRUZ searched plaintiff cell and Ransacked it.  
 ON 4/25/23 @ 3AM defendant % Harrison searched plaintiff cell and destroyed it  
 4/26/23 @ 3AM defendant Sgt. N. CRUZ searched plaintiffs cell and left it messy  
 4/27/23 @ 3AM Defendant % Clarke completely destroyed cell, Tossed things everywhere  
 4/28/23 @ 3AM defendant Harrison searched plaintiffs cell and Flipped it a little  
 4/29/23 @ 3AM Sgt. A. CRUZ Looked over cell with plaintiff in it the shocked plaintiff  
 4/30/23 @ 3AM defendant Sgt. N. CRUZ TORE cell all the way up intentionally.  
 5/1/23 @ 3AM defendant Sgt. N. CRUZ searched cell Rather quickly this day.  
 5/2/23 @ 3AM defendant % Harrison searched plaintiffs cell and Read plaintiffs legal mail. He came to the door Reading Plaintiffs court order and Hes on video Footage Reading it. plaintiff is clearly upset, Sgt. Kinkelw then Read it with him and Told him to put it back. she Then Told plaintiff to: "grieve the matter and Tell like you Tell on Everything else".

5/3/23 Defendant Sgt. N. CRUZ searched plaintiffs cell and After she searched it, Defendant LT. Hugg walked on To the unit and directly into plaintiffs cell. Sgt. CRUZ did immediately inform Him (LT. Hugg) That she Thoroughly searched the cell But His still went inside the cell and Tossed the mattress and legal material everywhere, including the Floor. This is harassment as There was no penological Reason For Him To do That. Its 3:25 am Right now and my cell is in shambles. my (plaintiffs) light is on and He's cleaning like He does Everyday. Thoughts of suicide Has entered



Plaintiff mind and He's Really considering it This day. The constant Banging and screaming From the mental Health inmates is driving me (plaintiff Adams) crazy. This destroying my cell and officers laughing about it in my Face is Humiliating and it hurt me both physically and mentally. At 4:13AM defendant Sgt. CRUZ entered 7 cell and gave that inmate His suboxone medication and He was not sat outside of His cell and His cell is not being searched. He's on RTHU status too.

ON 5/4/23 @ 3AM plaintiffs cell was searched

ON 5/5/23 @ 3AM Plaintiffs cell was searched

ON 5/6/23 @ 3AM Plaintiffs cell was searched, The institution can search at any Time of Day But They intentionally Harass plaintiff at 3am, when He Takes His medication, in an attempt To deter plaintiff From Taking His needed disability medication. OFFICERS have Told plaintiff Directly, "stop Taking your Medication and we want come in there and search. Sgt. Odonnell-(Defendant)- Told plaintiff Adams to "Hurry up and swallow that shit".

Defendant % Faggin searched plaintiff cell while he was working the 10 to 6am shift on RTHU at 3am in the morning while plaintiff set in chair outside of His cell shackled and Handcuffed

Defendant % Rogue searched plaintiffs cell with sgt defendant CRUZ, Leaving everything out of order and messed up. plaintiff was upset because staff laughs and makes dumb jokes about Tearing His cell up



on 5/7/23 plaintiff Adams wrote a grievance on an officer (Defendant Kasprzak) and nurse ("Eva"). Grievance # 2023-32. In that grievance, plaintiff Told Authorities that nurse Eva Had Been Deliberately poisoning Him By slipping Him different medication under His Tongue instead of subarone. plaintiff is 100% consistant with Taking His **opioid use Disorder** medicine and it Takes 15-20 minutes To dissolve under His Tongue Every-single Time, (no matter the size of the pill). He Also Knows the Texture and Taste of His medication. He Requested a Blood Test and urine sample and Also He physically we Through changes as He was Forced To detox. The Following is the Response To plaintiffs Grievance: "As previously answered in grievance 2023-30, Inmates are subjected to searches at any time. As For your medical Complaint, you should submit a Request slip to medical or a sick call to address any concerns you Feel you may have with your prescribed medication. This grievance is denied."

plaintiff Adams Responded: "I Told you that nurse Eva is deliberately poisoning me and slowly Killing me with the substance she's giving me and you Tell my my grievance is denied? I've written medical and L.T. Thompson and Im Telling you this woman has deliberately been harming me and poisoning me by crushing up some other Type of medication and you Render me no help To protect me From the malicious malpractice and attempted murder of a nurse that works For primecare medical and you Deny me help and protection? Are you serious? what happened To care custody and control? I've become sick Behind her actions, Burns Arvd, Leg Ankle, Feet and Body swelling. plaintiff Adams Appeared To the Prison Oversight Board but no



Answer was given. He wrote His Appeal on lined paper and marked it in. Since the nurse ENNA Has not been Administering plaintiff His medication, His Bill of health has begun To TURN around For the Better. The Acid Build up that was Burning His Throat and coming up By the Gallons Has stopped. The painful Itching of His legs Has stopped. The swelling of His legs, Ankles, Feet and Elbows Have went down almost Back To normal. His Teeth in the Front part of His mouth are not sore and hurting and He Has not been experiencing withdrawal. Plaintiff is very aware of withdrawal as nurse Ivy of Delaware county correctional Facility and its other medical <sup>staff</sup> forced plaintiff To suffer needlessly and become hospitalized.



on 5/11/23 while plaintiff was in yard  
 C/O W. Labadie searched plaintiffs cell and left things  
 out of order enough to harass plaintiff and let  
 plaintiff know his cell was searched. *Twice that day.*

on 5/12/23 at 3am in the morning, Officer  
 Smythe searched my cell while I sat in the chair outside  
 of my cell. my cell was left in disarray. At 3:15am  
 Inmate Anderson in 2 cell whose on BHU status, was  
 not brought out his cell to take his medication and  
 his cell was not searched. This is discrimination  
 as plaintiff continues to be harassed and denied his  
 Equal protection of Law which he's guaranteed under  
 the 14<sup>th</sup> Amendment.

This excessive searching of plaintiffs cell is  
 truly causing psychological damage and causing plaintiff  
 to fear taking his disability medication as he's tired of having  
 to reorganize his paperwork and belongings. on 5/12/23  
 C/O A. Welner taunted plaintiff and pointed in plaintiffs face  
 through the door/glass. This causes plaintiff emotional  
 distress and pain because other inmates are allowed time  
 out of their cell and they walk around, taunting Mr.  
 Adams whose not allowed out of his cell at all. This  
 is deliberate torture that Bucks County is putting plaintiff  
 through knowing, he desires time out, visits, commissary food items  
 and to shower freely. Plaintiff should be housed with people who  
 doesn't taunt him with their hours of freedom. This is cruel



and unusual punishment in violation of the eighth Amendment and violation of plaintiff 14<sup>th</sup> Amendment of equal protection.

Defendant Hearing examined Dittman, sentenced the plaintiff to 20 additional days on BTH status without giving plaintiff a hearing. There was no hearing, The defendant did not come to plaintiff's cell with A "Jvc" To conduct a hearing and did not have a hearing.

o



ON 5/8/23 @ 6:10pm Inmate Anderson, now in MHU-7 cell, was cuffed and given His suboxone medication. He was not Taken out of His cell and His cell was not searched while He was Taking His medication.

ON 5/9/23 @ 3AM Plaintiffs cell was searched

ON 5/10/23 @ 3AM Plaintiffs cell was searched

ON 5/11/23 @ 3AM plaintiffs cell was search

ON 05/12/23 @ 3AM c/o Smythe searched plaintiffs cell while plaintiff sat in chair outside of cell. Inmate Anderson was not searched nor Removed From His cell For suboxone medication.

ON 5/13/23, - 5/14/23, - 5/15/23, - 5/16/23, - 5/17/23, and 5/18/23, @ 3AM plaintiff Adams cell was searched, Flipped and Harassment continued. Its Become even worse as plaintiff Adams and Defendant Sgt. N. Cruz Had a Fallout (Argument) and she Began To Really destroy His cell even more.

note: "plaintiff Adams Has explained everything in detail, IN His complaint that public defender Michael Huff was suppose To mail To This Honorable court on 4/21/23 For the norristown post office across From the courthouse.







Defendant J. polichetti searched plaintiff cell on 5/13/23 while nurse ENNA gave him his medication at 3am. Sgt. Odonnell was the supervisor overseeing that matter. After said officers quickly searched my cell idonnell said, "you searched it that Fast?" and officer polichetti said, "yes you Told me not To Tear it up, would you like me To give it its Normal Flipping?" Sgt. odonnell said, "you wasit suppose To say that in Front of Him." nurse ENNA Jammed plaintiff medication in his Face after He asked to see it, in an aggressive way That showed she meant to cause plaintiff discomfort. plaintiff has a right to ask to see. plaintiff's mouth is numb today and has a weird Taste, (lingering Taste) that does not Taste like The Suboxone medication He's been taking the last Few days. And again, After my medication and That process was over, and After plaintiff was placed Back in his cell, Inmate Anderson was given His medication and was not Removed From His cell nor was His cell searched.

Defendant mayers on 5/15/23 searched plaintiff cell at 2:55am, during the Time plaintiff was given his Disability medication. plaintiff asked Sgt. N. CRUZ why inmate Anderson in cell-MHU-3 wasit Removed From his cell and why his cell isnt ever search and she Replied, "you know the deal. you Tried To Assault one of our officers over on BHU - (Referring To 11/21/22). Just Dont come out and Take This medicine and we wont come in there." plaintiff stated, "This is Harassment," and Sgt. N. CRUZ said, Im



suppose to strip search you too so keep complaining and I'll really give you something to complain about." plaintiff's cell is left destroyed and he's up with the light on now cleaning it.

on 5/8/23 plaintiff Adams wrote the Law Library and Requested case-law and Bucks county polys. plaintiff Got back the Requested ~~case~~ law and documents on 5/14/23. Case manager Betz delivered the case law, (view video Footage of Delivery"). It took a week for plaintiff to get the cases he needed for Research when, he could have done his Research and more on Lexis Nexis ("10") Times Faster, Adequately obtaining the Legal Resources he needed to litigate his legal matter effectively. The way plaintiff is Afforded the Law library hinders his Access to the court greatly. plaintiff is a Pretrial Detainee whose been in the Hole for ~~SEVEN~~ months and That is cruel and unusual punishment as, He's not even Locked on The BHU-unit But was Transferred To the MHU-cells 3, 2 and 5 where inmates Bang, scream, yell, and smear feces and urine Everywhere.



Defendant Smythe on 5/16/23 at 3 am in the morning, After removing plaintiff from his cell, (MHU-7) went into the cell of Mr. Adams, Disability medication was administered. Plaintiff's cell was searched but it was not tore up by defendant % Smythe. AS soon as % Smythe walked out of plaintiff's cell, Defendant L.T. Hugg entered the unit and went directly to plaintiff Adams cell, (without speaking to anyone) and immediately flipped Mr. Adams cell. Sg T. Kinkelin continued to tell plaintiff to calm down by jestering with her hands ("as shown on video Footage") Because plaintiff was noticable getting upset and verbally said something to her. L.T. Hugg then stopped and talked with inmate Anderson, whose located in MHU-2 cell.

Defendants % Smythe, % Miles and Sg T. Kinkelin then cuffed inmate Anderson in MHU-2 cell and entered his cell where, He was administered His medication. Inmate Anderson was not shocked with leg IRONS, He was not removed from His cell and sat in a chair, nor was His cell searched when, Inmate Anderson is on "watch" and BHU status for introducing Drugs into the Facility and OR having illegal narcotic within the Facility, namely Meth. This inmate was on constant stool watch FOR 14 Days where, Officers sat outside the front of His door, placed Him in a (smock) = (Suicide Dress) and continued to watch Him until He gave Three good stool samples. Sg T. A. Beck,

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LT. Wylie and several CERT Team officer had to place Inmate Anderson in MHU-3 cell upon his arrival on to the unit. Several Blue glove Fingers was found on his body and in his sweat pants by Sgt. A. Beck. "view video Footage". This Inmate, MR. ANDERSON, is very combative and very Assaultive toward staff, inmates and property everyday and night. From Throwing urine and water on other inmates, Destroying property, violently using racial slurs and Lewd Homophobic and antigay Hate words - names and comments, Threatening staff and more. He continues to be on watch with a Inmate monitor - (Known as a Baby sitter) - on his door observing him and his Action. His cell is not searched nor is he ever searched. Inmate ANDERSON is not harassed like plaintiff Adams is. plaintiff Adams 14<sup>th</sup> Amendment Right of Equal protection of Law continues to be violated in a major way by Bucks county and its Correctional Officers who Deliberately and intentionally causes plaintiff Distress, pain, suffering, Harm and Harassment. plaintiff is ready to stop writing grievances and complaints because, He's receiving no Relief from Administration, other officers nor are the Higher Ranking officers doing anything to prevent this cruel and unusual punishment from being Imposed on plaintiff. Contraband is never found in plaintiff cell. A Tablet is not contraband when a officer issues it to you. How then can you punish a inmate if a officer allows him to use it?



Defendants % Clarke and Sgt. N. Cruz Ransacked  
 plaintiffs cell on 5/17/23. plaintiff asked why was  
 The Two officers Reading His legal mail because there  
 was a period of silence within the cell and  
 Sgt. N. Cruz said as she was exiting the cell,  
 "Because we can." This is cruel and unusual punishment  
 and its harassment to the highest degree. Every single  
 morning plaintiff's cell is search and trashed. Today  
 is Wednesday and Inmate Fred Anderson in MTH cell-2,  
 cell was not searched nor was he removed from  
 his cell. plaintiff is patiently waiting for his case docket  
 numbers to return so he can file his Amended complaint  
 and memorandum of law. plaintiff Adams have developed  
 a serious medical condition from being in the RTH for  
 so long, i.e (since 11/1/22). plaintiff legs, ankles and feet  
 have swelled 2 1/2 times their normal size. He was taken  
 to medical where, blood work was done to see what  
 the problem is. plaintiff also requested to be tested to  
 see what new substance was in his system due to nurse  
 error slipping plaintiff a different medication deliberately.  
 plaintiff wrote green slips to SPT. C. Metellus, Deputy warden  
 Cantino, Deputy warden K. Reed, Captain Nottingham, (LT. Thompson,  
 asking for his help) and Defendant (LT. Clayton, requesting his  
 support). Note: LT. Thompson is not a defendant in this  
 matter. He is the only high ranking official who has  
 done anything to help me in the immediate, meaning ("right then  
 and there when I asked"). I've only asked him for  
 something twice and that was to call my attorney.







on 5/19/23 Sgt. Cruz and P.O. Bromiley  
 Ransacked plaintiff's cell and Tossed my legal  
 mail everywhere. plaintiff noticeable made a  
 complaint about it where officers then began  
 to forcefully try to lift plaintiff leg after  
 he told them his leg don't lift. This is Harassment  
 and they are deliberately provoking Mr. Adams,  
 trying to force him to respond in a negative  
 way and they only do this antagonizing search  
 during the time plaintiff takes his disability med.  
 The institution can search the cell at any other  
 time during the day but at 3am every morning  
 when an individual is woke out of his sleep  
 is cruel and then to force someone to have to  
 clean up every morning like this is wrong.  
 plaintiff Adams sent captain Nottingham the following  
 request slip: "captain Nottingham, every morning at 3am you  
 have these people search my cell and they destroy my cell and  
 toss my legal work everywhere. This is not done to no other  
 inmate on HCU status. This is an attempt of staff and  
 the facility trying to provoke me. my cell can be searched  
 at any other time during the day but you pick the time  
 I take my disability medication to order officers to ransack  
 my cell, talk aggressively to me and disrespect me by constantly  
 grabbing and gripping me. I have no tablet in my cell and  
 you know that. Officer Bromiley Tossed my legal mail  
 everywhere and then he sat in my cell reading my legal  
 documents. my cell is in disarray and you people are abusing  
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and Harassing me. I'm asking you to stop. my Attorney Louis Busico is getting a copy of this Request stop. you want someone to behave But you keep Beating Them. How can They not Respond or be upset?"

Plaintiff was told to stop taking His Disability medication and His cell would not be searched. This is cruel and unusual punishment as staff are TRYING to deter plaintiff From taking his medication as, They ARE association The negative Harassment with the positive medication time. plaintiff told Defendant Smythe That He didn't want to Take His medication one morning and, He began to walk away and closed plaintiff's Tray slot. plaintiff's cell was not going to be searched. This is deliberate Harassment By correctional officers, Their supervisors and Captain Nottingham.



Defendant CRUZ searched on 5/21/23

Defendant Smythe searched on 5/20/23

Defendant LaBadie searched on 3/19/23

On the 19<sup>th</sup> and 20<sup>th</sup>, Sgt K. Kinbelen ordered a quick pass over search where The officers just entered The cell and looked on the surface of things. She stated, "you know I'm not trying to Fuck your stuff up like other officers. I know the searching is a bit much But if you stop taking your meds and coming out we won't go in there."

Plaintiff Admits this excessive search every day is mentally tearing him down. To witness his legal papers tossed about and other property tore up is demoralizing. Defendant Sgt. n CRUZ just Threw all plaintiff's manilla envelopes around. Officer Stewart came to plaintiff's door to give him words of encouragement and then returned to his desk and then put in a work order for plaintiff's toilet as it leaks when it's flushed.

Plaintiff is housed on MHU on BHU status. plaintiff is a pretrial detainee who has been locked in a cell since 11/1/22. Video Footage from that day will show Officer Simpson starting a confrontation between inmates and it will show him teaming up <sup>with</sup> a Inmate. That inmate broke into plaintiff's cell because of the faulty locking mechanisms that Bucks county has failed to fix for over 20 years and that



negligent Act as denied plaintiff Adams the protection He is guaranteed under the 14<sup>th</sup> Amendment of the United States Constitution. Bucks County decided to Build an attaching Female prison ~~to~~ instead of Fixing the doors to the cells and making them Tamper proof/escape proof and secure for inmates inside to be protected from in house danger. The cell doors did not keep plaintiff safe from a Inmate who broke in nor did it keep plaintiff in when He psychologically broke down from being mentally Tortured for Three weeks by C/O F. Williams.

Defendant Bromley destroyed plaintiff's cell on 5/22/23 at 3am in the morning. Plaintiff tried complaining to defendant Sgt. N. Cruz But she told plaintiff, "we can Read everything in that cell and go through it, I don't care if its legal work or not. That's what I hate about you Faggots yall whine too much." Plaintiff said, "How are you going to say something like that when your gay too?" plaintiff then looked in his cell around C/O Long who was in cert gear; because He (plaintiff) heard papers rip, and saw his legal mail out of the manilla envelope Tossed about. He said, "Look at my mail (legal mail)!" Defendant Sgt. N. Cruz did not do anything to stop plaintiff cell from being Tossed/Tore up



Defendant Bromiley on 5/24/23 destroyed plaintiff Adams cell and then wrote Adams up in a misconduct lying stating plaintiff Adams said: "I will fuck you up," when Adams said nothing close to that. plaintiff stated, "This is Harassment, I'm going to sue each and every last one of you for doing this to me."

Defendant Bromiley and Harrison and Sgt. R. Cruz destroyed plaintiff Adams cell on 5/25/23 and again still found no contraband. no contraband is every found and they continue to harass and destroy plaintiffs cell each and everyday and then talk negatively to plaintiff as if he is not suppose to respond.

on 5/24/23 at 7:30pm Bromiley Relieved Officer Bombay for his 15 to 30 minute break. Officer Defendant Bromiley came to Adams cell and stated, "We are going to hand you the first chance we get you off of camera. you's a monkey that should be tared and feathered." plaintiff Adams replied, "you's a lying Redneck whose scared to death of me, you fear this Black King, and you'll never open this door and hang me yourself." Defendant Bromiley stated, "Don't sleep too hard nigger. us good ol' white boys know how to make the power go out. when the power goes out so does the camera's and you'll be another nigger written



as a Inmate suicide." plaintiff Adams yelled out the door, "It wont be you who do nothing to me, I contacted The Authorities..... and Defendant Bromiley said, "I am the Authority."

on 5/24/23 Between the Time of 9am in the morning and 11am, defendant Lt. Clayton entered The MHU unit. He stopped at plaintiffs cell and Asked if He was Alright. plaintiff Responded no! plaintiff Adams Then began To Explain To him the Events That Took place at 3:00am that morning. plaintiff said, "None of the white Inmates on RHU status thats on suboxone, cell is ever searched nor are They Brought outside Their cell. Defendant Lt. Clayton Smiled and Then said; "you Colored's Cant Be trusted and you was born a darkie, sucks To be you." He Then walked off and AS He was leaving, he said, "This aint a black jail like clet Hmmmie.... ya'meen, Imitating The Black urban dialect From Philadelphia.

plaintiff Adams Called His Attorney Mr. Louis Busico of Newtown PA 18904, Address being 133 N. State Street; Telephone numbers 215 504 2930 at about 9am on 5/24/23 and immediately complained about the misconduct He Received and stated, "please get me out of this Jail." In about Ten days plaintiff Has Trial or pretrial so His Attorney advised He To remain patient and that He would Try To do something at pretrial. plaintiff Then motioned This Honorable court.



Defendants Sgt. N. Cruz and C/O Barnett searched plaintiff's cell at 2:30 AM on 5/28/23. Plaintiff's cell was left with a white substance splashed on the floor and his mattress and things were out of order but, it wasn't trashed or ransacked this morning. However, plaintiff was awakened at 2:30 in the morning to take his medication, waking a person dead <sup>out</sup> of their sleep early in the morning like that every single morning is bothersome. Then to search him and only him is harassment. The two white inmates, i.e., "Mr. Morning and Andersons," was on R/HV status, took subarone, wasn't removed from their cell and was not searched. Only plaintiff Adams, a Black man is singled out. Mikhail, inmate #131081 cell was never searched when he was removed from it to go to medical while on R/HV status. Plaintiff's equal protection of rights under the 14<sup>th</sup> Amendment has continued to be violated.

Plaintiff requested to press charges on inmate who deliberately spit in his face. He (plaintiff Adams) was taken to medical and treated by nurse Amy who also gave plaintiff an antibiotic. She lied to plaintiff when he asked her what type of disease does inmate (Johnny Aguirre #133425) have. Sgt. Murphy and C/O Marino who is not a defendant escorted plaintiff to medical after they removed the inmate who spit between the security gate in Adams' face. Adams requested to press charges and the investigators denied him the right to uphold the law. (Because that inmate was transferred to Norman State Hospital.)

On 11/26/22 plaintiff became sick and threw up and vomit got



on Inmate David Gentile. David Gentile wrote to the investigator saying He wanted to press charges because He believed plaintiff deliberately spit on him. Plaintiff Adams had been Tied (Transferred to George W. Hill Correctional Facility in Delaware county, to prevent Him from Filing grievances and law suits against Bucks county. Plaintiff Adams had never once been in Delaware county ever and had no charges in Delaware county). Plaintiff Adams, while at Delaware county, was charged with Aggravated Harassment due to David Gentile pressing charges, defendant Brassells who Lied and c/o Hernandez (who is not a defendant in this case) who inadvertently may have gotten a little vomit on Him. David Gentile, who is white, contacted the investigator via Inmate Request slip and stated He wanted to press charges. Plaintiff Adams who is Black, stated He wanted to press charges and Exhibit HHA (Request to investigator) who show plaintiff was denied. (Exhibit with this complaint)

Defendant Smythe searched plaintiff Adams cell on 5/27/23, at 3am in the morning. Plaintiff Adams is never found with contraband in His cell. He Asked Officers to stop harassing Him and They literally said NO OR (Stop Taking your morning meds and we wont come in and search you). Plaintiff said, "no to meds on 5-26-23 and defendant Smythe got Ready to close Tray slot and walk away without searching plaintiff's cell." Plaintiff needs His Disability medication and cuffed up to Take it and c/o Smythe searched His cell this day as well.

5/1/2



Defendant Hearing Misconduct Examiner Dittman violated Plaintiff's procedural due process rights by sanctioning Plaintiff to 20 days RTHU time, without giving Plaintiff a hearing. He never enters the unit and asked Mr. Adams if he wanted to participate in a misconduct hearing. Instead of following procedure and protocol, Dittman said, "I called and asked Officer Butler ~~was~~ DID you want to participate in your hearing. I heard him ask you and you said no!" It's literally impossible for that to have happened as Mr. Adams is behind a metal door with a plexiglass top and you can't hear through the door, across 10 feet of floor, through the phone! Plaintiff is locked in 24 hours a day. % Butler is indeed Bros and has written Plaintiff up. There's no way defendant could have heard anything like that from Plaintiff and he denied Plaintiff his procedural due process, sentencing Plaintiff to more RTHU time, which is False Imprisonment.

Defendant % w. Labadie searched Plaintiff cell for a second time while Plaintiff was in the yard. Plaintiff cell had already been searched ~~that~~ morning at 3am. There was no need to search cell again.

Defendant Simpson searched Plaintiff cell while he was at court after the cell had been searched at 3am. Sgt R. Gross ordered the cell searched to harass



Plaintiff as it did. Simpson told plaintiff only after plaintiff asked after noticing his cell changed.

Defendant % M. Gray searched plaintiff cell for a second time while plaintiff was in the yard. There was no need to search plaintiff's cell as it had already been searched at 3am and plaintiff had no way of getting contraband. There's never any contraband in plaintiff's cell. A Tablet is not contraband as the institution issues them to inmates and majority of the time, officers give plaintiff Tablets as they understand he misses his children and family. Plaintiff has been in the hole since 11/1/22 and has been denied visits with his family and more. See exhibits mark grievance with this complaint.

Defendant nurse ENNA has been deliberately slipping plaintiff different medication, poisoning him for months, causing him medical complications and more. She's seen on video footage shoveling medicine in plaintiff's face, trying to not let him see what he's taking. MR. Adams looks at his medication every day as he has the right to. She has not been back to give plaintiff his medication for a week or two since he filed grievance. Plaintiff is 1000% sure nurse ENNA has slipped him something different and <sup>was</sup> poison. Bucks County denied plaintiff help after he told about the deliberate poisoning.



Defendant % O. D. O'CONNOR From about 11/22/22 up until 12/13/22, did in fact deliver Food to Plaintiff the was spit in with Clob of Tobacco Juice spit, Hog spit, and gelly gue like substances in His Finger Food Bags. plaintiff Had to be Fed By other Inmates who, placed Food Items in Brown paper Bag and slid them under door to plaintiff.

Defendant % new on many different occasions, when He delivered plaintiff Adams Food, did in fact serve plaintiff Food with spit, Tobacco spit, Juice and other slimy substances that didn't belong in the Food Bag. plaintiff Adams was so Hungry one day that He stood and Looked Directly into the Rotating camera that stayed locked on Him and Ate the waste covered Food with a sense of Bravery. plaintiff couldn't take the hunger.

Defendant % McFadden searched plaintiffs cell at 3am in the morning while plaintiff was getting His disability medication and plaintiffs cell was messed up. McFadden also intentionally clenched Handcuff tightly on plaintiff during the time He cuffed plaintiff in the morning at 3am.

Defendant % mayer searched plaintiffs cell at 3am in the morning when plaintiff takes His disability medication. plaintiffs cell was left in disarray but not badly. It was



searched to harass plaintiff mainly.

Defendant % Glenn Has searched plaintiff's cell at 3am in the morning. plaintiff Adams legal mail was moved around and his cell was left in disorder.

Defendant % Roque searched plaintiff's cell with Sgt. N. Cruz and cell was tore up lightly at 3 am in the morning.

Defendant Bromley destroyed plaintiff's cell at 3Am in the morning, Ripping plaintiff envelopes and legal papers. Sgt. N. Cruz seen plaintiff's legal mail Thrown around and said nothing. plaintiff's cell was destroyed.

on 5/24/25 Defendants Bromley and Harrison, destroyed plaintiff's cell and plaintiff stated He was going to sue defendants for harassing him. Bromley wrote plaintiff up, and stated plaintiff said, "I will Fuck you up." plaintiff said no such thing. Hearing Examiner still found plaintiff guilty when plaintiff explained He is allowed to say "Im a sue or write you up as it is litigation." plaintiff was found guilty and given 10 more days KHu Time.



131. Mr. Adams cell was searched by officer Mayers and Mr. Adams complained. Mayers did indeed Ransack Mr. Adams cell ~~AND~~ stated, "I have to follow orders". Mr. Adams said, "write a memo about it please."

132. Mr. Adams cell was searched by officer Faggins who worked the 4 to 6 shift on his unit. Mr. Adams complained to Sgt. O'Donnell who then told him, "Hurry up and swallow that shit in your mouth. If you don't want your cell searched, don't take your meds." Mr. Adams said, "This is harassment and discrimination. I'm the only cell ever searched".

133. Mr. Adams cell was searched by officer M. Gray and Ransacked on 4/10/23. Mr. Adams cell was searched ~~Twice~~ that day when there's no possible way contraband could be in his cell.

134. Mr. Adams also complained about being housed on the Mental Health unit and stated that the staff there at Bucks County Correctional was deliberately torturing him by housing him on that unit with inmates who bang 24 hours a day.

135. Mr. Adams has not once has his under clothes



washed by the Facility's Laundry like the Rest of the Jail and That's Because Laundry of the personal soat is not picked up on the MHU unit. please view vided Footage of unit, personal laundry is never collected and MR. Adams cell is searched Every day.

136. MR. Adams Has Been Tortured At Bucks county Facility. MR. Adams Tried To press charges of officer Simpson and Inmate Borling But the Investigator's deliberately disregarded MR. Adams letters and Request.

137. MR. Adams Has Asked For a RHU Time cut so He may do legal Research To Litigate his cases and contact His Attorneys. MR. Adams is Blocked From Law library on the Tablet device and There is no physical law library Here at Buck.

138. Research is Research and you start by punching something into "Lexis" and Finding what best Fits your case and situation. IF a person Doesn't know what To Look For, They won't know what To Request. To Block someone From the law library is denying them Access To the courts. Its denying the their 4, 14<sup>th</sup>, 1<sup>st</sup> amendment of the U.S Constitution. Bucks County's law library is inadequate and Takes To Long To get case law and legal Documents Back.



ON 5/29/23 Defendant Sgt. N. Cruz, NOW Defendant % Carulli, entered plaintiff's cell and tore it all the way up. plaintiff's legal mail is out of the envelopes that held them and it tossed around. Defendant Carulli set in plaintiff Adams cell reading his legal mail and Sgt. N. Cruz approved of this invasion of legal privacy and violations of constitutional rights. plaintiff Adams is missing evidence which shows responses to handwritten grievance sent to Deputy warden K. Reed. plaintiff is missing medical request slip where Prime-Care medical responded back to complaint about nurse Enna slipping plaintiff medication that caused Mr. Adams physical medical problems. Defendant Sgt. Cruz and Bucks County staff are not looking for tablets but are looking for legal documents against them. Officers Labadie, Smothers, Bueler who was going to leave handcuffs on plaintiff. Defendant % W. Labadie looked in cell and saw defendant CARULLI destroying Mr. Adams cell and plaintiff asked him to say something, "Tell him to stop reading plaintiff's legal document" and defendant % Labadie said "No! I can't do that. you know this would happen you should of stayed it."

plaintiff Adams hereby reveals that John Doe #3 LT. Officer is Lt. Minasian. He is one of the supervisors that plaintiff Adams complained about the inhumane conditions to, begged for a mattress and help. Each and every Last Lieutenant and Sergeant mentioned in this complaint, plaintiff



Adams has plead with For Help. He's Begged For a Hot Shower and a mattress. Plaintiff suffered 3<sup>rd</sup> degree Burns To His groin area and was Taken To medical B/ LT. Clayton.

Recently, plaintiff Has been unable To sleep properly Has He's Scared OF Being Hung like Officer Brumely Told Him staff was going To do To Him. Plaintiff is in Fear OF His life and Has been preparing For when that day comes Every noise plaintiff pops up and watches His cell door For staff. one Day, His cell door is going To ease open and a storm of correctional officers of Bucks county is going To Rush in and AFTER Fighting and seriously hurting plaintiff, Tie a Rope or a sheet around MR. Adams neck like Officer Brumely. plaintiff Has asked For a grievance But was denied. plaintiff Adams Life Has been Threatened over 20 Times and These are serious meaningful Threats and plaintiff Believes it. Nurse Enwa Has been slipping MR Adams poison For months!

This is the First time since November OF 2022 that MR. Adams Has begun To feel normal without any physical body changes.

Plaintiff is now going over His Legal material so He can send out what's Required.



## CAUSES OF ACTION Legal Claims

### COUNT I

#### Violation of the AMERICANS WITH DISABILITIES ACT (Against Defendant BUCKS COUNTY)

139. Plaintiff hereby incorporates by Reference the allegations contained in each and every preceding paragraph, as if Fully set forth herein.

140. MR. Adams is a qualified individual with a disability which substantially limits his major life activities.

141. Defendant Bucks County Correctional Facility discriminated against and caused MR. Adams to be excluded from Programs, Services, protection and activities at Bucks County Correctional Facility, due to his disability, in violation of Title II of the Americans with Disability Act.

### COUNT II

#### Violation of the Rehabilitation ACT (Against Defendants Bucks County, Bucks County policy makers and Bucks Administration)

142. Plaintiff hereby incorporates by Reference the allegations contained in each, and every preceding paragraph, as if Fully set forth herein



143. Mr. Adams is a qualified individual with a disability which substantially limits his major life activities.

144. Defendant Bucks County, Bucks County policy makers and Bucks Administration discriminated against and caused Mr. Adams to be excluded from participation in programs, services, protection and activities at **BUCKS** County Correctional Facility due to his disability, in violation of Section 504 of the Rehabilitation Act.

### COUNT III

Inadequate Medical Care Under The Fourteenth Amendment (Against Defendants Bucks County, PrimeCare Medical, INC., SpDt. C. Metellus, Dr. V. Gessner, Nurse Jamie, Lt. Wylie, Brian Norfleet, Deputy Kelly Reed, Sgt. Murphy, Nurse ENNA, **Sgt. A. Cruz**

145. Plaintiff hereby incorporates by reference the allegations contained in each and every preceding paragraph, as if fully set forth therein.

146. Defendant's acts and omissions in denying Mr. Adams Adequate medical Treatment were objectively unreasonable, causing an excessive risk to his health and safety.

147. Defendants were deliberately indifferent to Mr. Adams serious medical needs, causing him to suffer needlessly and creating a substantial risk of future harm.

147 1/2. Defendant **Sgt. A. Cruz** was deliberately indifferent to Mr. Adams medical needs in denying him a Rape Kit when he was at medical on 11/1/22.  
(b4) (b1)



148. Defendants were deliberately indifferent to Mr. Adams serious medical needs by indulging in malpractice namely nurse Jamie Fox placing Mr. Adams on medical watch solely for the likes of Lt. Wylie and Sgt. Murphy's Request on 11/26/21, after a medical emergency was called to MHU-2 cell. Nurse Jamie falsified medical documents after refusing Mr. Adams medical treatment. An incident report should have been filed but video footage of medical emergency is available. Primecare medical refuse to help Mr. Adams creating a substantial risk of future harm. And nurse enna for attempting to murder plaintiff.

149. Defendant acts and omissions in denying Mr. Adams adequate medical treatment were objectively unreasonable causing Mr. Adams to suffer with a fractured nose, torn ligaments in right hand, torn ligaments in shoulder, left facial contusion, head swelling, 3 degree burns to his genital area, dehydration and a infection from being housed in cells covered with feces and urine, causing an excessive risk to his health and safety. Mr. Adams wrote numerous sick call slips stating he was sick but primecare medical INC. staff failed to help Mr. Adams.

#### COUNT IV

violation of the 6<sup>th</sup> Amendment Right to counsel, 1<sup>st</sup> Amendment violation of Freedom of speech to LAWYER; opening Legal mail while not in Mr. Adams presence; Removing Legal documents, Censoring Legal documents and Denying Mr. Adams Law library, violated Plaintiffs 4<sup>th</sup> and 14<sup>th</sup> Amendment Constitution Rights (Against Defendants Bucks county; SpdT. Metellus; Deputy warden Cantino; Deputy Warden. Kelly Reed; Bucks county policy makers; LT. Hugg, Captain Nottingham and Bucks county Administration.



150. Plaintiff hereby incorporates by reference the allegations contained in each, and ever preceding paragraph, as if fully set forth herein.

151. Defendant LT. Hugg did indeed open Mr. Adams legal mail that was delivered to Bucks County Correctional Facility by Bucks County Sheriffs on Friday, December 2, 2022. Mr. Adams was rushed to Doylestown Hospital by Doylestown Sheriffs due to injuries he obtained at Bucks County Correctional Facility from Bucks County Correctional officers. Mr. Adams legal work was labeled Legal work in Big Black Letters.

152. Mr. Adams had called Bucks County Sheriffs and spoke to Sheriffs directly who, insured him his legal mail and documents would be delivered on Friday, the 2nd of December 2022. Adams admit and so they was delivered to the prison on Friday after their evening prisoner return.

152. on Sunday at 3 or 4am LT. Hugg did rip open Mr. Adams Manila envelope that was labeled "Legal work," that was delivered by Bucks County Sheriffs, and read Mr. Adams legal work, outside of Mr. Adams presence. LT. Hugg then removed legal papers and other documents that was legal material from Philadelphia, Berks and Montgomery County and other legal documents that he chose, and placed them in the



The property room, censoring what legal documents Mr. Adams could have.

153. <sup>Defendant</sup> LT. Hugg Did indeed walk Through the Hallways with Mr. Adams Legal envelope (manila) To be open with documents Exposed. LT. Hugg Then entered The MHU unit and placed The To be envelope on the desk.

154. Mr. Adams complained To LT. Hugg about His Legal mail being open without being in front of Him and Then, He complained about Legal documents missing. LT. Hugg Replied, "I removed Legal papers and documents That was not from Bucks county." Our policy says no other county's Legal documents are allowed in our Facility and I can Take and remove Legal papers". Mr. Adams stated The legal documents was mailed in and He needed Them as they Come from the Courts.

155. ON December 3, 2022 Mr. Adams Had a parole Hearing with The Pennsylvania state parole Board. Counsel for Mr. Adams Testified that, Required documents for Mr. Adams was confiscated by prison official and that counsel needed a continuance To get documents and better prepare for Mr. Adams hearing. Mr. Adams would Have been vindicated of The violations



By the parole Board if He was able to present legal documents illegally taken by Bucks county and LT Hugg.

156. Mr. Adams was unable to properly represent himself or provide the state parole board with the evidence needed to prove he didn't change his address because, Bucks county's policy ordered the taking of all legal documents and material that was not from Bucks county to be taken, yet Bucks county Correctional Facility allows video court proceedings to be held in its facility. Bucks county also allows such documents to be mailed in.

157. ~~defendant~~ ~~LT Hugg~~ violated Mr. Adams confidentiality right with his attorney by reading Mr. Adams legal documents and then removing documents that would of vindicated Mr. Adams. unknown officer in reception took legal documents from Mr. Adams as well.

158. <sup>defendant</sup> Captain Nottingham blocked Mr. Adams from Lexis nexis law library by giving order for Adams accounts to be blocked and suspended. He also stopped Mr. Adams from calling his attorney as Mr. Adams is block from using the phone to call his attorney. Bucks county has blocked Mr. Adams from using Lexis nexis law library and Bucks county does not have a adequate law library for Mr. Adams to do legal research.



159. Defendant deputy warden cantino gave the illegal order for Mr. Adams to be denied access to the courts by ordering Mr. Adams to be blocked from Lexis nexis and making legal calls to his attorney. Mr. Adams account has been blocked, frozen and suspended so, he cant order hygiene products or do legal work.

160. Defendants Bucks county, SPDT. Metellus, Bucks county Policy makers, Bucks county Administrators, denied Mr. Adams from making legal calls or any call since 11/1/2022. no Inmate on RHC status, (especially Mr. Adams) is allowed to make a call which is cruel and unusual punishment as it denies Mr. Adams, who is a pretrial detainee, access to the court. Bucks county's policy orders staff to harass Mr. Adams every day by searching his cell. and denying him access to the court.

161. Plaintiff Mr. Adams wrote grievance stating His legal rights to access the courts and call his lawyers. He even placed legal documents citing law but, to no avail.

162. By Defendants illegal actions, Failing to correct that misconduct, and encouraging the continuation of the misconduct All Defendants are in violation of Mr. Adams 6<sup>th</sup>, 1<sup>st</sup>, 4<sup>th</sup> 14<sup>th</sup> and 8<sup>th</sup> Amendment of the UNITED STATES CONSTITUTION and causing Plaintiff Adams pain, suffering, Emotional Distress, Injury to his First Amendment Rights and It denies him Equal protections of LAW.



## COUNT V

Defendant Bucks County, Spdt. Metellus, Officer G. Simpson (Professional Negligence under Pennsylvania Law); Deliberate Indifference, 14<sup>th</sup> Amendment Violations

163 Plaintiff hereby incorporates by reference the allegations contained in each and every preceding paragraph, as if fully set forth therein.

164. Defendants acts and omissions in denying Mr. Adams Adequate and equal protection as Defendant had a duty to act in accordance with the standard of care required of security professionals and to act as a reasonable person would under the same or similar circumstances. Bucks County has known for years about how unsafe their cell doors were.

165. Defendants Bucks County and Superintendent Metellus Failed to order, install, replace, fix or provide inmates with tamper-proof doors or doors with locks or locking devices that couldn't be tampered with, broke into or picked to either get out or break in. After, He became aware of the faulty locking mechanisms/locks within the cell doors within the facility. Both Defendants Bucks County and Spdt. Metellus was aware of the faulty locks within the doors and failed to replace the locks, which allowed inmate Boiling to break into Mr. Adams cell and assault him. The faulty locking (67)



devices/mechanisms within the doors, was not only reported by Mr. Adams but, also by staff and the thousands of misconduct reports throughout the years of inmates picking cell door locks to break in and out of cells.

166. Defendant's Failure To provide safe secure door with adequate locks allowed Inmate Cody Atkinson To pick a cell door lock on C-unit which, caused Him to become Mr. Adams cell-mate on RTHU-in cell 15.

167. Defendant's professional negligence caused unsafe conditions for Mr. Adams and ultimately enabled the assault on Mr. Adams after Officer Simpson deliberately put Mr. Adams in danger of being assaulted by Inmate Bowling. Officer Simpson was fully aware of the danger Mr. Adams was in as Inmate Bowling stated ("I'm a knock this nigger out... walk off"-or-"Take a walk").

168. Defendant Simpson, Failed To provide Mr. Adams with protection and allowed inmate Bowling To break into Mr. Adams cell or, "buzzed inmate Bowling into Mr. Adams cell and Allowed Mr. Adams To be Assaulted. (See video Footage of 11/1/22, Bowling Breaking in cell).

169. Defendant's Failed To provide Mr. Adams with protection under the 14 Amendment of the United States Constitution, causing Mr. Adams pain, suffering, emotional



distress, And Harm. Defendants Deliberate Indifference caused Mr. Adams to be Assaulted by Inmate Borling. Video Footage shows Officer Simpson causing the argument by calling Inmate Borling to assist him in a verbal dispute with 9 cell. Officer then assisted Inmate Borling in assaulting Mr. Adams by allowing Inmate Borling unrestricted access to Mr. Adams cell. Inmate Borling is seen on video breaking into Inmate Adams cell.

## COUNT VI

Defendant Officer Franklin Williams did indeed Assault Plaintiff by Threatening, Degrading, Discriminating, Humiliating, Insulting, Labeling a Jail House Switch, Labeling A Fagget, antagonizing, Mentally abusing, psychologically torturing, defaming, verbally abusing and violated His 8<sup>th</sup> and 14<sup>th</sup> amendment. Violation of the Americans with disabilities Act and Retaliation.

170. Defendant Officer F. Williams Began His attack on plaintiff 11/2/22 when He saw Mr. Adams on watch and Found out Mr. Adams Had Filed a hand written grievance against the warden about the faulty locking devices within the doors. Inmate Steven was Mr. Adams Baby sister - (monitor) on Mr. Adams dock.

171. Defendant Williams Threaten To shoot Mr. Adams on numerous occasions and He Frequently called plaintiff a Nigger multiple Times a Day. Plaintiff Responded with



"I'm not your nigger nor anyone elses nigger for that matter." And the defendant stated, "you dumb ass nigger, I can call your stupid ass nigger as much as I want, we're both black." Plaintiff and defendant began arguing about plaintiffs rights.

172. Defendant Williams stood on plaintiffs cell door, "BHO-7" and said, "Damn your ass is fat, but it open for me", while plaintiff was in prostration. Plaintiff didn't respond. Later that day, defendant called plaintiff a Fagget and yelled to the block, "this Fagget got beat up by inmate Bailey and now He pray to Allah writing grievance".

173. Defendant Williams got on plaintiffs cell-7 door and began threatening to find his wife and "fuck her". Plaintiff replied by spitting on the glass window.

174. Defendant told plaintiff He should kill himself after He listened to plaintiff ~~TELL~~ another inmate He almost killed himself by over dose when He and His wife Had first split up. Defendant encouraged mr. Adams on one occasion to, save his psyche meds for a week and then take them all at one time.

175. Defendant began calling plaintiff Homo muhammad ~~AND~~ Faggets even more when and After He moved



plaintiff to 15 cell. Defendant can be seen on camera holding his keys and creeping up to the shower where Mr. Adams was, then peaking into the shower.

176. Defendant was caught threatening plaintiff as he stood on plaintiff's door, by LT. Whitesall. Defendant was then removed from unit for a few days.

177. Defendant threaten plaintiff's children and stated he would get plaintiff's wife's address from the plaintiff visiting list and "Fucking shoot" plaintiff son's after he "Fucked" plaintiff's wife in front of son.

178. For three weeks straight, with the exception of Defendant's days off, Defendant maliciously threatened, cursed out, stood on door and provoked plaintiff, called plaintiff Faggots, Homo's, Homo muhammad, gaylord, niggers, Bitch and niggers, Fagget a niggers, Dick suckers, Dick eaters and more, often causing plaintiff to cry as he was unable to stop the assault.

179. Defendant Williams stood on plaintiff's door and told him to kill himself again and after Williams said he would kill Mr. Adams son, Mr. Adams began to consider following officer Williams orders and thought about hanging him self, (like Williams had suggested)



180. on 11/21/22 while plaintiff Adams was in the shower, Defendant Williams entered Mr. Adams cell (for the first time ever). Defendant had never been in Mr. Adams cell since Mr. Adams had been on unit. Defendant tossed Mr. Adams Quran on the floor under the toilet and then smeared some type of white substance on Mr. Adams Islamic paper work. (See Exhibit 13 for actual smeared substance in right upper corner of document.) (plaintiff Request to get substance tested on chemical compounds of substance on paper to determine what it is and to prove, it's not something the plaintiff had or could have). (Exhibit in First TOST Filed and Given to Attorney to mail on 4/2/23).

181. Defendant's actions violated plaintiff's 8<sup>th</sup> Amendment and caused plaintiff severe pain, suffering and emotional distress as plaintiff is a mental health patient who suffers with manic Bi-polar disorder, Bi-polar Depression, Recurring depression, oppositional Defiant Disorder, PTSD, Impulsive disorder, opioid use disorder, paranoia and paranoid schizophrenia. plaintiff also suffers with Gender Dysphoria issues that only he faces as the type of LGBTQ+ male he is.

182. Defendant Williams onslaught of homophobic slurs violated plaintiff's Equal protection right under the 14<sup>th</sup> amendment and he discriminated against plaintiff, and caused great psychological harm to Mr. Adams that caused him to suffer needlessly and created a substantial risk to his health and



safety.

## COUNT VII

EXCESSIVE FORCE, Beating Cuffed Plaintiff in Violation of the 8<sup>th</sup>, 4<sup>th</sup> and 14<sup>th</sup> Amendment of the United States Constitution (Officer Schuster and one John Doe officer) (Sgt. Beck, Officer Geibert) John Doe # 2 officer!

180. After plaintiff found his Quran tossed on the floor and defaced and his other religious material destroyed, He called officer Williams to cell 15 door and questioned him.

181. Defendant Williams taunted plaintiff and said, "why Allah aint protect his book you fuckin' faggot? write a grievance like you been doing pussy. I'll break your fucking face you bitch ass nigga. Aint no faggot every been able to beat me. Im not from around here. I'll fuck you up. Get the investigators to find out what it is (referring to the white substance). plaintiff said, "open the door and I'll show you how much of a faggot I really am."

182. Defendant officer Franklin Williams told plaintiff, "Go ahead and kick the door open you fake strong faggot ass nigga. Talking about you squat 600 pounds and dead lift 700. Kick the door open faggot, you got my permission. come on I dare ya, Bitch ass nigga". etc...etc.



183. Defendant stated Mr. Adams tried to punch and kick which means Adams didn't touch him. See, issued misconduct by defendant F. Williams.

184. Defendant Schuster kneed plaintiff Adams in the head and face repeatedly while plaintiff was handcuffed and subdued by other officers. Another officer punched plaintiff in the face repeatedly. Plaintiff laid motionless and handcuffed on floor.

185 Defendant South maliciously and sadistically tried to head butt - spear Mr. Adams in the face and used a menacing style upwards proportion as he tucked his head to smash it into plaintiff's defenseless face to drive the nose cartilage of plaintiff's up into his brain. Defendant South testified to deliberately trying to tackle the surrendering plaintiff who was not protecting himself as he was wide open to serious injury and, The Honorable Judge Doupe dismissed the charges. Defendant South missed his intended target and slammed face first into the concrete. Plaintiff laid on the floor motionless with his hands behind him. He was motionless and not resisting. % John Doe #1 punched Mr. Adams in the face while he was cuffed. Officers wore blue gloves. Plaintiff was punched in the face again and again.



186. Plaintiff was Kneed in head and Temple area by defendant schuster, Ripping skin From plaintiffs Face. After being lifted defendant schuster said, "sorry I got caught up in the moment." while in holding cell in Hallway, defendant schuster came and Apologized again. In fact, officer schuster apologized several times For Assaulting plaintiff, several officers Tried To secretly speak To plaintiff and video Footage will prove this as plaintiff will Translate For the court as will his service superiors and brothers.

187. Plaintiff Face swelled, His nose swelled, Hands swelled and other physical complication.

188. Defendant Sgt. Beck, C/O Geibert and John doe C/O #2 officers Reported To mhu-3 cell that evening on 11/21/22 and used Excessive Force on MR. Adams.



Sgt. Beck clamped the cuffs around Mr. Adams right hand until it could clamp no more and then placed all his body weight on it (the cuffs to clamp more). He then stratched Mr. Adams through the tray slot. Mr. Adams who was complaining about left side numbness was unable to walk correctly. After falling ~~onwardly~~ from being stratched Sgt. Beck laughed "That wasn't suppose to happen". Officer Geibert kicked Mr. Adams in the face in a stepping way and then left the cell after cuffs were removed. Someone hit Plaintiff in back of head.

189. Defendants beat Mr. Adams when he was handcuffed and mtfonless. Video Footage will show Officer Schuster kneeling Mr. Adams in the head and face area repeatedly. From that position, there was no way officer Schuster was trying to do anything but maliciously and sadistically hurt Mr. Adams which he succeeded to do.

190. Mr. Adams suffered a fractured nose, torn ligaments in his right hand, shoulder sustained torn ligaments, a concussion, dehydration and some type of internal infection from Bucks county staff and medical department.

191. Defendants actions are the direct results of 8<sup>th</sup> Amendment violations of the constitutional Amendment. Mr. Adams was not <sup>He</sup> unhelpful, cooperated and had surrendered willingly. Officers



Took it upon them selves to Beat and Assault MR Adams Thinking, MR Adams Had Assaulted MR. Williams But MR. F. Williams Stated, "MR. Adams did not Hit me with a pole." MR. Williams also Stated that He was not struck at all in His misconduct report. please see Exhibit Labeled RHU-1 when Williams said "Inmate Tried to punch and Kick." To Try to punch and Kick is To Fail.

192. By defendant punching, kneeling, kicking and smashing the handcuff super super tightly on MR. Adams and Rotating His shoulder's all the way up while He was cuffed through The TRY slot, and while He was cuffed, defendants were objectively unreasonable, causing excessive risk to his health and safety. Defendants were deliberately indifferent to MR. Adams causing Him To suffer physically injury, emotional distress and severe pain.

### COUNT VII

Guard Brutality, unsanitary conditions, calculated Harassment, Deliberate indifference, "deprives plaintiff of Basic Human need such as Exercise, Hygiene, A mattress, A shower, Denied Adequate medical Treatment, excessive search, cruel and unusual punishment For Being Stripped and left Naked in Front of other Inmates To humiliate Plaintiff and in violation of the PREA Act, Being Stripped searched in Front of Female officer, To protect prisoners From violence at the hands of other prisoners under the 8<sup>th</sup> Amendment, 14 Amendment violations, professional



Negligence, 1<sup>st</sup>, 4<sup>th</sup>, 6<sup>th</sup>, and violations of the Americans with Disabilities Act

193. Plaintiff hereby incorporates by reference the allegations in each and every preceding paragraph, as if fully set forth herein.

194. Mr. Adams is a qualified individual with a disability which substantially limits his major life activities.

195. Defendants Bucks county Correctional Facility; superintendant Metellus; Deputy warden K. Reed; Deputy warden Galiane; Deputy warden Cantino; Captain Nottingham; LT. K. Wylie; LT. M. Clayton; LT. C. Hugg; LT. J. Whitehall; Sgt. N. Murphy; Sgt. M. Raggi; Sgt. A. Beck; Sgt. B. Gross; Sgt. N. Cruz; Sgt. C. O'Donnell; Sgt. A. Cruz; Sgt. K. Kinkel; correctional officer G. Simpson; officer Franklin Williams; officer Schuster; officer McFadden; officer Swan; officer B. Butler; officer Clarke; officer Harrison; officer M. Gray; officer D. Connor; officer New; correctional officer John Doe 1, 2 and 3; correctional officer Black; officer Geibert; officer Romano; officer Mayers; officer Miles; officer Faggins; Bucks county policy makers; Bucks county Administration office; Primecare medical, Inc.; chief medical Administrator Brian Norfleet; Bucks county Misconduct Examiner Dittman; case manager David Webb; correctional officer Smythe; correctional officer Hortilenko; were deliberately indifferent to Mr. Adams in violation of the 14<sup>th</sup>, 8<sup>th</sup>, 4<sup>th</sup>, 1<sup>st</sup> and 6<sup>th</sup> Amendment of the United States Constitution. At All Relevant Times, The Defendants had a duty to correct that misconduct of plaintiff.



constantly Being harassed, The excessive searching, The beating and physical abuse, The denial of basic needs, the depriving of Sanitary conditions, The depriving of Hygiene and ~~showers~~ and Exercise yard, The Right To be Free From physical harm and psychological Abuse; The denial of the courts, The denial to access The courts, The denial of Lawyer client confidentiality, The Failure To provide Adequate Housing where plaintiff is safe From intruder Behind secure doors, The denial of His Prea Rights, The denial of His Right To not be Retaliated against By staff For Filing grievances and complaints; and encouraging the continuation of the misconduct,..... All named defendants is also violating plaintiff Adams Rights under the Eighth Amendment to the UNITED STATES Constitution and causing Plaintiff Adams pain, suffering, physical Injury and emotional distress.

196. Defendant officer Hontidenko searched plaintiff Adams cell on 4/14/23 when, Mr. Adams was Taking His suboxone medication. Sgt. K. Kinkelin order He searched Adams cell. Adams stated, "This is Harassment," To Sgt. Kinkelin and she stated, "I'm only Following orders." Mr. Adams Asked Her To report such misconduct and she stated: "No I will not."

197. Defendants Deputy Cantino and captain Nottingham, did indeed Retaliate against plaintiff by Blocking plaintiff From Lexis nexis, Because plaintiff was doing Research Required For Filing Law suit against the warden, captain and other prison officials. Mr. Adams



activity could be followed and prison official saw that he used his provided Tablet Time to attend the law library. To block plaintiff Adams from Lexis nexis was indeed unconstitutional as it denied him access to the court. Shutting down Mr. Adams ability to use the phone and call his lawyer is unconstitutional and violate his 1<sup>st</sup> amendment. Officer's give Mr. Adams Tablets as well as inmates to assist Mr. Adams as it is cruel and unusual punishment to have a pretrial detainee in the BHU, unable to use the phone to call family and attorney for so long. Mr. Adams has been in the Hole unjustly since 11/1/22 and remains in the Hole unjustly until this 4 day of April, 2023. Mr. Adams has been housed on the MHU unit in cells covered with feces and where inmates bang on their doors 24/7, causing plaintiff Adams torment. (Today's Date 5/29/23)

198. Defendants captain Nottingham and Deputy warden Candace Thore plaintiff Adams account preventing him from buying soap, envelopes, writing paper and magic shave. Plaintiff was also transferred to Delaware county's George W. Hill correctional facility to prevent him from filing grievance & charges against officers who beat him. All of this would have stopped an average person from filing grievances and continuing their law suit. The first grievance filed about the faulty locking mechanisms/devices in the doors caused officer Franklin Williams to retaliate against him and then HE was beaten and mope.



## PRAY FOR RELIEF

WHEREFORE, Plaintiff Robert L. Adams Respectfully Request that this court enter judgement:

1. Granting Plaintiff Adams a declaration that the acts and omissions described herein violated his Rights under the Constitution and Laws of the United States, and
2. A preliminary and permanent injunction ordering defendants Bucks County, Superintendent Metellus, Captain Nottingham, Deputy warden Cantino to un-restrict my Account and Allow plaintiff to use Lexis nexis on Tablet and; To Allow plaintiff to call Family and Attorney; and To Return all confiscated legal and paper work to plaintiff; and To Stop searching plaintiff's cell everyday and; To cut the Rest of plaintiff's RHU Time as He was given additional Time For having Tablets That officers gave or additional Time For Fingerprint matters and; To Remove security Bulletin (in) status from plaintiff so that plaintiff may move freely without shackles. Plaintiff Has RHU Time until 7/26/23.
3. Granting Plaintiff Adams compensatory damages in the Amount of \$100,000 (one hundred Thousand) against each defendant, jointly and severally.
4. Plaintiff Adams seeks nominal damages and punitive



damages in the amount of \$ 50,000 (Fifty thousand) against each defendant, jointly and severally.

5. Reasonable attorney's fees and cost; and
6. Such other relief the court deems just and proper.

Date:

Respectfully Submitted, Robert L Adams JR  
#074562

Bucks county Correctional Facility  
1730 S. EASTON Road  
Doylestown PA 18901

### VERIFICATION

I have read the foregoing complaint and hereby verify that the matters alleged therein are true, except as to matters alleged on information and belief, and, as to those, I believe to be true. I certify under penalty of perjury that the foregoing is true and correct.

Respectfully Submitted



IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN  
DISTRICT OF PENNSYLVANIA

Robert L. Adams JR

v.

Bucks County; Sgt. Jurgelewicz

correctional officer south

correctional officer mattoi

correctional officer Kasyprzak

correctional officer carulli

case no.

PRO-se Attached Complaint PART II

on 10/1/22 Plaintiff Robert L. Adams entered the Bucks County Correctional Facility on charges deriving from Bensalem Pennsylvania. while at Bucks County plaintiff Adams was Assaulted by staff while He was handcuffed, placed in cells covered with feces and urine, Denied a mattress and shower for weeks, His Food was spit in, His legal mail was searched outside of His Presence and Then legal documents were removed - Hendering his Defences" He Was Stripped naked for no penological Reason and Left naked in front of other inmates on two separate occasions. He's denied acces to the courts, Denied visitations, called a bunch of niggers and faggots and Homo muhammads, stripped searched in front of a female guard, Transferred To prevent Him From Filing grievances and Harassed by Extreme excessive searching of His cell every single day For over 75 probably 90 days and County; Intentional Infliction of Emotional Distress, conspiracy, Excessive force, negligence, cruel and unusual punishment, Deliberate Indifference, Denial of Equal Protection of Law, denial of due process,



psychological Torture and mental Torment, Inhumane unsanitary conditions in violation of 14<sup>th</sup> and 8<sup>th</sup> Amendment and; Attempted murder by defendants nurse ENNA and correctional officer south in violation of 8<sup>th</sup> Amendment.

ON 11/21/22, OFFICER south deliberately Attempted To murder plaintiff Adams by intentionally Tucking his Bald head and TRYING To smash it into plaintiff Adams Face by Launching His Head upwards at plaintiff defenceless Falling Face with the full force and weight of His Racing Body Behind it. Defendant %o south was Running at Top speed while Plaintiff Adams had surrendered, going down to the Floor. Adams Face and neck was wide open. OFFICER south did not Follow any Protocol OR Rule of engagement when Responding to a disturbance. Defendant %o south did not give a verbal directive nor did He need to Because plaintiff was away From everyone in surrender going down. Defendant %o south maliciously and sadistically attempted To murder plaintiff Adams as video shows How-(south intentionally lowered his head and lead with his head, "not His hands", in an attempt To murder / Fatally injury plaintiff Adams). His head was Aimed at plaintiffs Face and His upwards propulsion is a death move To drive a person's nose cartilage up into Their Brain, which murders an individual. plaintiff Adams was defenceless and going down to the Floor when Defendant %o south Attempted To murder Him with a mercenary Kill move. Defendant CORRECTIONAL OFFICER south Did



## JURISDICTION & venue

1. This is a civil action Authorized By 42 U.S.C. Section 1983 to Redress the deprivation, under color of state Law, of the Rights secured by the constitution of the United States. The court has Jurisdiction under 28 U.S.C. section 1331 and 1343 (a)(3). plaintiff seeks declaratory Relief pursuant to 28 U.S.C. Section 2201 and 2202. plaintiff claims For injunctive Relief are authorized by 28 U.S.C. section 2283 & 2284 and Rule 65 of the Federal Rules of civil procedure.

2. venue lies in this Judicial district pursuant to 28 U.S.C. § 1391 (b) (2) because the events giving Rise to this action occurred in Bucks county, Pennsylvania, within the eastern District of Pennsylvania.

## PARTIES

3. Plaintiff Robert L. Adams is a 42-year-old man who is/was incarcerated at Bucks county Correctional Facility From October 1, 2022 until current Date 5/7/23

4. Defendant Correctional officer South is a officer at Bucks county Correctional Facility, who at all Time Held the Rank of Guard when mention IN this Complaint



missed His Intentional Calculate Attack on plaintiff Adams and crashed into the concrete Face First. Adams remained motionless on the Floor and was quickly Hand Cuffed and Then Assaulted By officer schuster and Jone Doe #1 who punched plaintiff in the Face with blue gloves on. plaintiff continues to be harassed by Bucks County and it officials everyday, searching and Ransacking His cell, Reading His legal work and Taking it out of sealed envelopes. Nurse ENNA Attempted to murder plaintiff. Mr. Adams Brings this Action pursuant to 42 U.S.C. § 1983 For violations of His Rights under the Fourteenth Amendment of the UNITED STATES Constitution; The Americans with Disability Act of 1990 ("ADA"), 42 U.S.C. § 12132; The Rehabilitation Act; Excessive Force; Attempted murder in violation of the 8<sup>th</sup> and 14<sup>th</sup> Amendment of The constitution; Deliberate Indifference, 29 U.S.C. § 794; Pennsylvania professional negligence Law, violations of the 1<sup>st</sup> and 4<sup>th</sup> Amendment of the united states constitution;



5. Defendant(s) correctional officer Kasyph2K is a officer at Bucks county correctional Facility who at all Times mentioned in this complaint Held the Rank of Guard, Defendant 'O CARULLI' is a guard at Bucks, Held Rank of Guard.
6. Defendant correctional officer "mattor" is a officer at Bucks county correctional Facility, who at all Times mentioned in this complaint held the Rank of Guard.
7. Defendant correctional officer John Doe # 4 "intake officers" is officer Keefe, who at all Times mentioned in this complaint Held the Rank of Guard.
8. EACH Defendant is sued individually and in his or Her official capacity. At All Times mentioned in this complaint EACH defendant acted under the color of State Law.
9. Defendant Bucks county's District Attorney's Office, At all Times mentioned in this complaint was the District Attorney. The Defendant is sued individually and in his/her official capacity. At All Times mentioned in this complaint defendant acted under the color of state Law.
- 9.5 Defendant Sgt. Turgelewicz is a officer at Bucks county correction Facility who held the Rank of Sgt at All Times mentioned in this complaint. He is legally Responsible For inmate care and operations of Bucks. He's Being Sued in his individual and official capacity. He Acted under the color of state law  
(4)



10.25 Defendant Sgt. Hodges is a Sgt. At Bucks county  
correctional Facility who at All Times mentioned in this complaint  
Held the Rank of Sgt. He is Being sued in His individual and  
official capacity. He acted under the color of state Law



## FACTS

10. on 4/20/23 Plaintiff Filed a 1983 naming 57 Defendant in it. plaintiff now Amends To that complaint issues that derive From the First complaint. Complaint was given to Attorney Michael Huff to make.
11. on 11/21/23 while plaintiff was in a defenseless position of surrender, Defendant % South Attempted to outright murder plaintiff Adams by Tucking His head and upwardly Launching himself while moving at Full speed, in a spear like Head leading Fashion, To Smash his Head into plaintiff Adams Open Face. The speed defendant south was Running with and the upward propulsion He Attempted to use, is a Fatal mercenary death move used to kill.
12. Video Footage shows Defendant % south Deliberately leading with His Head To maliciously Attempt to murder / Fatally injure plaintiff Adams. Plaintiff's Face was wide open and He was down in surrender.
13. plaintiff Adams Hands were on the Floor, He was not Fighting nor Resisting. He was going down on His own and He was not harming no one. Mr. Adams was Defenseless. He Had no protective equipment on.
14. Defendant % south was Running at top speed and testified He was deliberately Trying To Tackle plaintiff Adams. The Honorable Judge Doupe of Beck's county Then Dismissed The Aggravated Assault charges that



Defendants South and The District Attorney of Bucks and Bucks county Tried charging plaintiff with.

15. Defendant's South, Bucks county District Attorneys office and Bucks county Then had a surprise preliminary hearing on March 13, 2023 charging plaintiff with Aggravated Assault and other charges, "while plaintiff was counsel for plaintiff" was not There.

16. Defendants South and Bucks county District Attorneys office Then had a preliminary hearing without plaintiff and stated plaintiff waived preliminary.

17. Plaintiff never waived a preliminary hearing. on March 13, 2023 plaintiff didn't even Have an attorney and The public defenders office Had Been declined To represent plaintiff as it was a conflict of interest.

18. Plaintiff never signed any waiver nor did plaintiffs private Attorney "Louis Busico". plaintiff 4<sup>th</sup> Amendment of due process Has Been violated By Both defendants South and Bucks county District Attorney. This is a illegal prejudicial Act committed By the commonwealth and it is a miscarriage of justice. plaintiff is being held in prison, Locked Behind metal doors 24/7 and must be Transported with high Ranking officers present.

19. Plaintiffs Hearing was set For March 27<sup>th</sup>, 2023 and The commonwealth maliciously moved up the date  
(7)



and illegally held a hearing without plaintiff.

20. no officer opened plaintiff cell door on 3/13/23 and officer Stewart (who is not a defendant) told plaintiff he had a hearing at the Department of Corrections in Philadelphia. He read "Hearing at DC", to plaintiff and plaintiff stated: "I don't have any cases in Philadelphia."

21. Defendant C/o Keefe is John Doe # 4 from intake who, removed legal documents from plaintiff's legal material upon plaintiff's transfer back to Bucks County Facility from George W. Hill Correctional Facility in Delaware County Pennsylvania. The removal of those documents <sup>was</sup> solely because Bucks County's name wasn't printed on them and because they were from another district court, due to Bucks County policy, it was unconstitutional and violated plaintiff's 2<sup>nd</sup> and 14<sup>th</sup> Amendment of due process. plaintiff lost his parole hearing because he could not provide those documents to show he didn't change his address.

22. plaintiff continues to be harassed by Bucks County officers every morning at 3am, when he takes his disability medication. on 5/2/23 defendant officer Harrison searched plaintiff's cell and illegally began reading plaintiff's legal mail. He then came to the door reading the legal document and plaintiff began complaining immediately. plaintiff said, "you're breaking the law" and defendant Harrison said, "I am the F\*cking Law". Sgt. Kinkel then read the document as well and told him to put it back.



please see video Footage For defendant Reading plaintiffs legal mail at Door.

23. Defendant Kasprzak searched plaintiffs cell on 4/21/23 and Trashed plaintiffs cell. He stepped on plaintiffs legal work and other written on papers. plaintiff did indeed complain To Sgt K. ~~Kirklin~~ and she spelled out The officers name For plaintiff.

24. Defendant Smythe searched plaintiffs cell on 4/22/23 during the 3am Time plaintiff Takes His Disability meds. plaintiffs Belongs was Tossed around again.

25. Defendant Sgt. N. Cruz searched plaintiffs cell on 4/23/23 and 4/24/23 and left the cell Tossed up both Times. plaintiff Asked Her To Stop Teasing His cell up and an officer said, "stop Taking your meds and we wont be here."

26. Defendant Harrison searched plaintiffs cell on 4/25/23. This Day, Defendant Didn't Teak the cell up badly But He placed plaintiffs Quran on the Floor.

27. Defendant Sgt. N. Cruz searched plaintiffs cell on 4/26/23. cell was not left in disarray this Day badly <sup>at</sup> it was Still searched To Harass plaintiff.

28. Defendant clark destroyed plaintiffs cell on 4/27/23 and Then Tossed Away Food of plaintiffs that he had in Two  
(9)



coffee bags. He Hide the bags in front of Him as he went to the Trash. please view vides Footage. plaintiff also argued with Sgt. Beck while He heard His cell Being destroyed about his cell being destroyed.

29. Defendant Harrison searched plaintiffs cell on 4/28/23 cell was left in disarray and plaintiff again asked staff to stop Harassing Him.

30. Defendant Sgt. A. Cruz, on 4/29/23 shackled plaintiff inside the cell and quickly looked over papers, Bed and under matters in front of plaintiff. He did not leave the cell in disarray, but the search still bothered plaintiff and words were exchanged between plaintiff and Defendant.

31. Defendant Sgt. N. Cruz on 4/30/23 and 5/1/23 searched plaintiffs cell. plaintiff complained but to no Avail. Cell was not ransacked These Times, but searched.

32. Defendant Sgt. N. Cruz on 5/3/23 searched plaintiff Adams cell at 3am. After she Had searched it, LT. Hugg walked onto the unit and headed into plaintiffs cell. Defendant Sgt. N. Cruz informed Defendant LT. Hugg that she Literally just searched the cell Herself and He still went in plaintiffs cell and Tossed plaintiffs mattress up on the Floor and His paper work. There was no penological Reason For Him to just do That. It's 3:25am and plaintiffs cell is in shambles. This is so depressing, sad and Hurtful.



33. Defendant Sgt. N. Cruz and officers at 4:13am this 5/3/23 entered 7 cell and gave inmate morning His suboxone medication and He was not taken out of His cell nor was His cell searched.
34. Defendant Sgt. N. Cruz searched plaintiffs cell on 5/4/23 and left it not to bad this day But the harassment continues and is causing plaintiff emotional and mental Anguish. Messing up His cell makes plaintiff clean every morning.
35. Defendant Mattoei entered plaintiffs cell and searched it. All plaintiffs legal work and case laws was dumped on the bed frame and mixed up. This is a shame! Its taken plaintiff over 24 hours to sort through all this paperwork. Its mentally exhausting.
36. Defendant Smythe searched plaintiffs cell on 5/6/23. As He searched, plaintiff sat in seat listening. cell was not trashed but things were out of order. plaintiff is really bothered a great deal. Especially when at 4:45am, inmate morning in MHU-7 cell, was handcuffed, sat in a chair outside of His cell and given His medication and His cell was not searched. A Guard didn't even enter his cell. He is on RTHU status as well and He doesn't get treated like plaintiff. He was not searched. plaintiff is singled out
37. Defendant Sgt. N. Cruz searched plaintiffs cell on this 5/7/23 and quickly Tossed papers and Flopped His mattress. plaintiff complained to Sgt. N. Cruz about



his cell being Trashed Real quick and He also complained about the Dosage of His medication. He Told Sgt. N. Cruz That the dose nurse Enna gave Him was not His 16 milligrams and that his meds did not taste like His medication. Its a problem that Hes only had with nurse Enna and she's given him other medication that was not his before. Sgt. N. Cruz allegedly logged it in digitally and made a note about it. plaintiff wrote a grievance. He's 100% positive nurse Enna deliberately gave him <sup>different</sup> meds.

38. Defendant Sgt. N. Cruz Then, After placing Adams Back in His cell, went To cell 7 and pulled inmate morning out of His cell For His Suboxone medication. Inmate morning Takes 16 mg of Suboxone as well and it Took him a significant amount of Time To take His medication as it normally Takes plaintiff. please view video Footage. Inmate morning cell was not searched nor was the other RTHU Inmates cells searched on RTHU. plaintiff knows this because He can hear what staff does over the Radio and The Suboxone officers Thomas, returned To The RTHU unit To Believe officers Stewart For His Break. plaintiff Adams is singled out By staff and Retaliated against and Harassed Every day.

39. plaintiff Adams wrote a complaint about nurse Enna whose Been deliberately Tampering with his medication. she either gives Him something completely different or lesser The dosage purposely. He's complained about this To Sgt. Bagg,



Sgt. N. Cruz, Sgt. Kinkelin, and nurse Samre. plaintiff Requested a Blood Test But Heard nothing in Response.

40. plaintiff's phone pin is still Blocked on this 10<sup>th</sup> Day of May, 2023. LT. Thompson gave plaintiff permission To call His Attorney on 5/8/23. LT. Thompson Has Full Authorization to Allow such actions. He Allowed plaintiff Adams To get a Tablet and ordered correctional officer smothers To give plaintiff Adams a Tablet at 7:30am. officer smothers Followed His supervisor's orders. plaintiff Tried calling His Attorney Mr. Louis Busico at 215-504-2930 and plaintiff's pin was Blocked. plaintiff Tried His pin Several Times But To no Avail. Inmate Michael Mogilevich #131081, pin code 50752, was able To call Attorney Louis Busico's office. He is on RTHU status and He's not Blocked From Lexis nexis, the phone, movie services, nor is his cell searched when He's taken out of His cell. plaintiff's 1<sup>st</sup>, 4<sup>th</sup>, 8<sup>th</sup> and 14<sup>th</sup> Amendment equal protection and due process Rights are being violated.

41. Every morning at 3am when plaintiff is awoken To take His disability medication, His cell is searched and Tore up and legal mail illegally Read By officers in Retaliation of plaintiff Filing grievances and a Law suit. Its Done To Harass and mentally Torture plaintiff. Bucks county is completely Torturing and Tormenting plaintiff at Every turn in violation of Every Right that plaintiff Has under the UNITED STATES CONSTITUTION and plaintiff Begs For Help.



4/6.5 Defendant Sgt. CRUZ searched plaintiff's cell at 3am on 5/8/23. She was accompanied by two other SGT's and a new class of officers. As usual, plaintiff was handcuffed, shackled and set in a chair outside of his cell. All 16mg of his **ODD** (opioid use disorder) medication was given to him and Sgt CRUZ lightly did a search of plaintiff's cell in front of the new class. For the sake of routine harassment is the reason she entered plaintiff's cell because she really didn't touch anything this day. more like rearranged 3 books and 2 manilla envelopes and that was it, besides kicking trash out of the cell. At 3:15am Sgt. N. CRUZ entered inmate "mornings" cell and did not remove him from his cell "like all RTHU inmates who takes suboxone is suppose to be removed;" she entered his cell and called for two new officers to stand in the cell with her while "mornings" medication was given to him. At 3:18am Sgt. CRUZ and the two rookie officers exited MHU-7 cell without searching it and then **WENT** to the RTHU unit. The inmate in MHU-7 cell is on RTHU status just like Mr. Adams but, he's white. Adams is maliciously singled out by staff and harassed every single day for the purpose of causing him harm. Mr. Adams is being discriminated against and **he** suffers greatly behind it. Defendants are antagonizing Mr. Adams every single day with their calculated harassment and the destruction of his cell. The tampering with his mail and so much more. plaintiff begs this honorable court for relief before it's too late. plaintiff has developed mental issues behind being locked in the cell so long. His legs have swelled up and he now has some type of skin infection that

(13.5)



Itches. He Has placed in a sick call and the swelling Has been documented Two months ago.

41.7/5 Defendant Sgt. Hodges searched plaintiffs cell on 5/9/22. Defendant did not destroy Adams cell but searched it knowing how much it bothered Adams. Inmate Anderson, whose now in MHU-7 cell, cell was not searched. He was not removed from his cell. and on 5/10/23, Defendant Sgt. Jurgelewicz searched plaintiffs cell. plaintiffs cell was not take up but it was indeed searched for the sake of harassing plaintiff. MHU-7 cell was not searched this morning when Inmate Anderson was given his medication, nor was he shackled with leg IRONS and removed from his cell. The inmates on the RHU unit cell is not searched every time they take their suboxone medication. please view video footage



## CAUSES OF ACTION

### COUNT I

violation of the Americans with Disabilities Act (Against Defendants Bucks County, Sgt. N. Cruz, Sgt. A. Cruz, C/o South, C/o Matto, C/o Kosyprzk, Harrison, C/o Smythe, LT. Hugg, Sgt. Kerkwin), i Sgt. Hodges, Sgt. Jurgelewicz, <sup>All</sup> Defendants named in complaint

42. plaintiff hereby incorporates by reference the allegations contained in each and every preceding paragraph, as if fully set forth herein.

43. MR. Adams is a qualified individual with a disability which substantially limits his major life activities

44. Defendant Bucks County Correctional Facility and its staff discriminated against and caused MR. Adams to be excluded from programs, services, protection and activities at Bucks County Correctional Facility, due to his disability, in violation of Title I of the Americans with Disability Act.

### COUNT II

violation of the Rehabilitation Act (Against Defendants Bucks County and All Listed Defendants within this entire complaint that are correctional officers, namely: Superintendent C. Metellus; Deputy wardens Contino; Deputy warden K. Reed; Deputy warden Calione; Captain Nottingham; LT. K. Wylie; LT. Kavoch; LT. C. Hugg; LT. M. Clayton; LT. J. Whitesall; Sgt. N. Murphy; Sgt. M. Raggi; Sgt. A. Beck; Sgt. R. Gross; Sgt. N. Cruz; Sgt. C. O'Donnell; Sgt. Hodges; Sgt. Jurgelewicz



Sgt. K. Kinkel; Sgt. A. Cruz; C/O G. Simpson; C/O F. Williams; C/O Schuster; C/O McFadden; C/O Swan; C/O B. Butler; C/O Clarke; C/O Harrison; C/O M. Gray; C/O D. Connors; C/O New; C/O John Doe # 1; C/O John Doe # 2; C/O Keefe; Bucks county policy makers; C/O Black; C/O Geibert; C/O Romano; C/O Mayers; C/O Miles; C/O Faggins; C/O Smythe; C/O Hoxtendenko; C/O Glenn; and any other correctional officers that's been mentioned in this complaint (but mistakenly not mentioned here)

45. Plaintiff hereby incorporates by reference the allegations contained in each and every preceding paragraph, as if fully set forth herein.

46. Mr. Adams is a qualified individual with a disability which substantially limits his major life activities.

47. Defendants Bucks county and the correctional officers named in this complaint, discriminated against and caused Mr. Adams to be excluded from participation in programs, services, equal protection and activities at Bucks county due to his disability, in violation of Section 504 of the Rehabilitation act.

### COUNT III

Cruel and unusual punishment in violation of the 8<sup>th</sup> Amendment of the United States Constitution. Deliberate Indifference in violation of the 14<sup>th</sup> and 8<sup>th</sup> Amendment. Attempted murder/Intentionally trying to fatally wound plaintiff in violation of the 8<sup>th</sup> Amendment



of the United States Constitution and Excessive Force. (Defendant % South) **CONSPIRACY, Fourth Amendment due process violations**

48. Plaintiff hereby incorporates by Reference the allegations contained in each and every preceding paragraph, as if fully set forth therein.

49. Defendants act were objectively unreasonable and excessive, causing an excessive risk to the health and safety of plaintiff Adams.

50. Defendant was deliberately indifferent to Mr. Adams physical safety and well being as he maliciously, sadistically and intentionally attempted to murder plaintiff by trying to deliver a mercenary tactical head crushing death blow to the defenseless, surrendered plaintiff. This officer used no protocol, gave no verbal directive and used no training when engaging a surrendering inmate. Plaintiff hands was on the floor and face was open, defenseless when defendant South attempted to kill him. Defendant South intentionally lead with his head while moving with full speed for the purpose of causing fatal harm. He tucked his head and launched it upward while plaintiff was going down, in an attempt to murder plaintiff by driving his nose cartilage up into his brain. (please view video Footage)

51. Defendant % South intended to seriously hurt plaintiff with excessive force that was to cause harm instead of restore order. Although he missed his attempted murderous attack, he still used excessive force to harm plaintiff and it did harm



plaintiff severely as plaintiff was illegally and unconstitutionally charged with Aggravated Assault, causing plaintiff psychological grief, mental anguish, emotional distress, financial loss and extreme suffering as he's being tortured on the mental health unit where he's been housed. There's constant banging, screaming and unsanitary conditions which are nasty and inhumane. Staff also harass and retaliate against plaintiff every single day because of defendant South injuring himself. plaintiff was also beaten by officers because of defendant South's excessiveness.

52. Defendant % South followed no protocol or training and deliberately tried to murder plaintiff.

#### COUNT IV

plaintiffs First, Fourth, Eighth and Fourteenth Amendment has been violated by all % defendants named in the original complaint and in this amended complaint. plaintiffs right to counsel, freedom of speech, denied access to the court, denied equal protection, harassment, right of confidentiality between attorney and client, (defendants ranked guard / correctional officer)

53. plaintiff hereby incorporates by reference the allegations contained in each and every preceding paragraph, as if fully set forth herein.

54. Defendant Harrison read plaintiff legal mail and officer Keefe removed legal documents from plaintiff legal



work on or about 1/1/23 (when plaintiff returned back to Bucks county from George W. Hill Correctional Facility, in Delaware county. Such documents could and would have vindicated plaintiff at His Technical parole violation hearing with the Pennsylvania STATE PAROLE BOARD.

55. plaintiff cell is searched each and every day and was searched by these officers and more, Harassing the plaintiff during the time He takes His Disability medication. His cell is also left in disarray, Tote up, Trashed or messed up leaving him to clean up His cell every single morning. STAFF Has Told plaintiff Adams To stop taking His Disability medication if He wants them to stop search his cell. when He takes His medication is the only time his cell is searched, in an attempt to deter Him from taking His much needed medication. no other BHU Inmate cell is searched over Here on the MHU unit.

56. Plaintiff Has asked officers To File a misconduct Report about the excessive searching and To Report it. plaintiff wrote grievance and Request but He's still Harassed. plaintiff is Blocked From calling His attorney, Blocked From Lexis nexis and Denied visits.

57. By Defendants illegal actions, Failing to correct that misconduct, and encouraging the continuation of such misconduct, All defendants are in violation of MR. Adams 1<sup>st</sup>, 4<sup>th</sup>, 6<sup>th</sup>, 8<sup>th</sup> and 14<sup>th</sup> amendment of the United States constitution, causing



Plaintiff Adams pain, suffering, emotional distress, Injury to his First and 14<sup>th</sup> Amendment and they're torturing him with Harassment and more intentionally.

## COUNT V

Professional Negligence under Pennsylvania Law, Deliberate Indifference and 14<sup>th</sup> Amendment Equal protection violation (Defendant Correctional officers South)

58. Plaintiff hereby incorporates by Reference the allegations contained in each and every preceding paragraph, as if fully set forth therein.

59. Defendant's acts and omissions in denying Mr. Adams Adequate and equal protection as Defendant had a duty to act in accordance with the standard of care Required of security professionals and to act as a Reasonable person would under the same or similar circumstances. Turning one's self into a Human projectile for murderous intent and for causing malicious and sadistical Harm, violates the Equal protection clause of the plaintiffs, under the Fourteenth Amendment.

60. Defendant professional negligence caused unsafe conditions for plaintiff Adams and ultimately enabled or caused the Assault on Mr. Adams while he was Handcuffed by officer Schuster who Kicked plaintiff in the head Repeatedly, Fracturing his nose and damaging his face along with defendant officer John Doe #1 who punched plaintiff in the face over and over again.



## COUNT VI

4<sup>th</sup> Amendment of Due process violations By (Bucks county Correctional officer South, District Attorney of Bucks county, Bucks county Correctional Facility), conspiracy

61. Plaintiff hereby incorporates by Reference the allegations contained in each and every paragraph, as if fully set forth herein.

62. Defendant's acts and omissions were objectively unreasonable and outright against the Law.

63. Defendant South participated in a preliminary hearing conducted by the Bucks county District Attorney's office. The hearing was set for March 27<sup>th</sup> in front of the Honorable Judge Doupe and then all of a sudden and out of no where, A preliminary hearing was held on March 13 2023, in front of a completely different Judge, without plaintiff Adams being present. nor was there any counsel for plaintiff present. no public defender represented plaintiff because of a conflict of interest that was duly noted by the courts. plaintiff was not transported over to the courthouse as plaintiff is locked in a cell on RTHU status on the RTHU unit, in cell 5, 24 hours a day, Everyday! plaintiff Adams also has a security bulletin on him so he has to be shackled and there must be a supervisor present when transporting plaintiff. no supervisor opened plaintiff's tray slot so he could be handcuffed and then shackled. no supervisor opened plaintiff's door. plaintiff was told



by officers Stewart on the night shift that He had a "Hearing at DC" The Department of Corrections in the Philadelphia city. plaintiff stated He Had no charges in Philly.

64. on march 13, 2023, plaintiff Adams Tray slot was not opened for Him to be cuffed up so He could go to court. He was not told He had a preliminary hearing in Bucks county. (please view video Footage). plaintiff Adams did not waive His preliminary hearing and His Attorney MR. Louis Busico did not waive His hearing for Him. Its Illegal to Have a preliminary hearing without the plaintiff in the courtroom as plaintiff has the right to confront His accusers.

65. plaintiff did not Refuse This hearing nor did he sign and document. The Bucks county District attorney, defendants South and Bucks county illegally participated in a miscarriage of Justice to wrongfully charge and convict a innocent man.

66. Defendant District Attorney of Bucks illegally called an illegal hearing and Denied plaintiff His Due process Right in court, After Judge Doupe Had Dismissed charges with officers South once before. conspiring with % south

67. Defendants acts and omissions were objectively unreasonable and deliberately indifferent to MR. Adams 4<sup>th</sup> and 14<sup>th</sup> Amendment which guarantees Him Due process (21) and Equal Protection of Law



## under COUNT III

68.5 Defendant % south and The Bucks county district attorneys office conspired to Constitutionally violate plaintiff Adams 4<sup>th</sup> Amendment due process by illegally conducting a preliminary hearing without plaintiff Adams being present or counsel for plaintiff Adams being present on Adams behalf. plaintiff did not waive his preliminary hearing that was moved up through malicious prosecution and then held without adhering to the constitutional law that provide due process to each and every American. To allow such actions to continue any further would be a miscarriage of justice. plaintiff has the right to confront his accuser. The Honorable Judge Doupe dismissed the charges against plaintiff Adams after watching the video of Defendant South maliciously trying to fatally injure a defenceless plaintiff, After Defendant South testified to trying to tackle plaintiff for no penological Reason. Defendant south and The Bucks county district attorney office separated south from officers Williams case which is also illegal as it was all one event and there wasn't a break in events. Furthermore Defendant South dove into the floor himself and plaintiff is in no way responsible for his actions when Defendant South did not follow protocol and give a verbal directive! Bucks county correctional Facility and its officials, "Sgt. B. Gross and Defendant South along with the District attorneys of Bucks county who are also named as defendants in this civil

21.5



action, did indeed illegally conspire together to violate plaintiff Adams 4<sup>th</sup> and 14<sup>th</sup> amendment of due process. on 3/13/23 plaintiff Adams cell door on MHU-5 was not opened for him to go to court nor was his Tray slot opened for him to be handcuffed. defendant Sgt. R. Grous wrote MR. Adams up but he didn't say "Adams Refused court. He stated Inmate Roberts Refused court." Inmate Roberts is housed on E-Block while plaintiff Adams is housed on MHU-5. Inmate Adams Tray slot was never opened for court. The District Attorney of Bucks County, along with Sgt. R. Grous and defendant C/O South, tried to deliberately exclude plaintiff from again proving he was innocent of the crimes that try to accuse him of. Through malicious prosecution the district attorney has denied plaintiff his rights and due to public defender Michael Huff not mailing plaintiff complaint to this Honorable court, plaintiff has thoughts that add public defender Huff to the conspiracy of the above mentioned defendants as, there is no penological reason for counsel to not have mailed documents into the Federal court. plaintiff Adams has a deeper theory that he would like to share with this Honorable court but, not in this setting. plaintiff Adams never waived his preliminary hearing, his cell was never opened, his Tray slot was never opened for him to be cuffed and plaintiff respectfully request this Honorable court to stop this miscarriage of justice from continuing.

MR. Adams 8<sup>th</sup> Amendment was violated as this is cruel punishment and exhibit W4 for Inmate Roberts named in ms. conduct for refusing court if that's even true, not Inmate Adams. View video Footage plaintiff's door nor Tray slot was opened. (Inmate Roberts is on E-Block) this 5/29/23 ~~\_\_\_\_\_~~ 21.75



14<sup>th</sup> Amendment which guarantees Him Due process and Equal protection of Law

### PRAY FOR Relief

wherefore, Plaintiff Robert L. Adams Jr Respectfully Request that This Court enter Judgement:

1. Granting Plaintiff Adams a declaration that the acts and omissions described herein violated his Rights under the Constitution and Laws of the United States, and
2. A preliminary and permanent injunction ordering Defendants Bucks County to stop Harassing plaintiff with The everyday Excessive searching and Thashing plaintiffs cell; To stop searching plaintiffs cell during His medication Time; To unblock plaintiffs phone pin so plaintiff could phone His Attorney; To unblock plaintiff so He may use Lexis nexis Free Legal Service; To Dismiss The Illegal charges with prejudice as plaintiffs Due process of Law under 4<sup>th</sup> Amendment <sup>was</sup> violated and Because it would be a miscarriage of Justice To Allow the defendants To use the courts For personal illegal agendas. *Dismiss RTU Time!*
3. Granting plaintiff Adams compensatory damages in the Amount of \$100,000 (one hundred Thousand) against each defendant, jointly and severally.
4. Plaintiff Adams seeks nominal damages and punitive



Damages in the amount of \$ (60,000) sixty Thousand against each defendant, jointly and severally. For mental Anguish, pain and suffering and more.

5. Reasonable attorney fee and cost; and

6. Such other Relief the courts seems just and proper.

Date: 5/28/23

Respectfully submitted, Robert L. Adams JR  
# 074562

Bucks county correction Facility  
1730 S. EASTON Road  
Doylestown PA 18901

#### Verification

I have Read the Foregoing complaint and hereby verify that the matters alleged therein are true, except as to matters alleged on information and belief, and as to those, I believe True. I certify under penalty of perjury that the Foregoing is true and correct.

Respectfully submitted  
Robert L. Adams JR  
Robert L. Adams JR



Robert Adams-074562  
1730 S. EASTON ROAD  
DOYLESTOWN PA 18901



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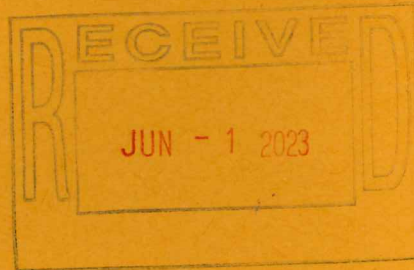


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